RISHI’S VISION PRIVACY STATEMENT

**Last Updated May 18, 2018**

Rishi’s Vision value you as our member and recognizes that privacy is important to you. We want you to be familiar with how we collect, use and disclose data.

This Privacy Statement describes the privacy practices of Rishi’s Vision for data that we collect:

* through website operated by us
* through the software applications made available by us for use on or through computers and mobile devices (the “Apps”)
* through our social media pages that we control
* through HTML-formatted email messages that we send you and through your communications with us
* when you attend one of our discourses/Seminars or through other offline interactions

Collectively, we refer to the Websites, the Apps and our Social Media Pages, as the “Online Services” and, together with offline channels, the “Services.” By using the Services, you agree to the terms and conditions of this Privacy Statement.

* [**Collection of Personal Data**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Collection_of_Personal_Data)
* [**How We Collect Personal Data**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#How_We_Collect_Personal_Data)
* [**Collection of Other Data**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Collection_of_Other_Data)
* [**How We Collect Other Data**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#How_We_Collect_Other_Data)
* [**Use of Personal Data and Other Data**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Use_of_Personal_Data_and_Other_Data)
* [**Disclosure of Personal Data and Other Data**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Disclosure_of_Personal_Data_and_Other_Data)
* [**Other Uses and Disclosures**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Other_Uses_and_Disclosures)
* [**Third Party Advertisers**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Third_Party_Advertisers)
* [**Security**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Security)
* [**Choices, Access and Retention**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Choices,_Access_and_Retention)
* [**How You Can Access, Change or Suppress Your Personal Data**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#How_You_Can_Access,_Change_or_Suppress_Your_Personal_Data)
* [**Retention**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Retention)
* [**Sensitive Data**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Sensitive_Data)
* [**Use of Services by Minors**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Use_of_Services_by_Minors)
* [**Cross-Border Transfer**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Cross-Border_Transfer)
* [**Updates to This Privacy Statement**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Updates_to_This_Privacy_Statement)
* [**Contacting Us**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Contacting_Us)
* [**Additional Information**](https://www.starwoodhotels.com/preferredguest/legal/privacy.html#Additional_Information)

COLLECTION OF PERSONAL DATA

“Personal Data” are data that identify you as an individual or relate to an identifiable individual.

We collect Personal Data in accordance with law, such as:

* Name
* Gender
* Postal address
* Telephone number
* Email address
* Credit and debit card number or other payment data
* Financial information in limited circumstances
* Language preference
* Date and place of birth
* Nationality
* Geo-location information
* Social media account ID, profile photo and other data publicly available
* Biometric data, such as digital images
* Images and video and audio data via: (a) security cameras located in public areas, such as hallways and lobbies, in our properties;

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

HOW WE COLLECT PERSONAL DATA

We collect Personal Data in a variety of ways:

* **Online Services.** We collect Personal Data when you make a reservation, purchase goods and services from our Website or Apps, communicate with us, or otherwise connect with us or post to social media pages, or sign up for a newsletter or participate in a survey, contest or promotional offer.
* **Property Visits and Offline Interactions.** We collect Personal Data when you visit our properties. We also collect Personal Data when you attend promotional events that we host or in which we participate, or when you provide your Personal Data to facilitate an event.
* **Customer Care Centres.** We collect Personal Data when you make a reservation over the phone, communicate with us by email, fax or via online chat services or contact customer service. These communications may be recorded for purposes of quality assurance and training.
* **Strategic Business Partners.** We collect Personal Data from companies with whom we partner to provide you with goods, services or offers based upon your experiences at our properties
* **Other Sources.** We collect Personal Data from other sources, such as public databases, joint marketing partners and other third parties.
* **Internet-Connected Devices.** We collect Personal Data from internet-connected devices available in our properties..
* **Physical & Mobile Location-Based Services.** We collect Personal Data if you download one of our Apps or choose to participate in certain programs. For example, we may collect the precise physical location of your device by using satellite, cell phone tower, WiFi signals, or other technologies. We will collect this data if you opt in through the App or other program (either during your initial login or later) to receive the special offers and to enable location-driven capabilities on your mobile device. If you have opted-in, the App or other program will continue to collect location data when you are in or near a participating property until you log off or close application (i.e., the App or other program will collect this data if it is running in the background) or if you use your phone’s or other device’s setting to disable location capabilities for our App or other program.

COLLECTION OF OTHER DATA

“Other Data” are data that generally do not reveal your specific identity or do not directly relate to an individual. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data. Other Data include:

* Browser and device data
* App usage data
* Data collected through cookies, pixel tags and other technologies
* Demographic data and other data provided by you
* Aggregated data

HOW WE COLLECT OTHER DATA

We collect Other Data in a variety of ways:

* **Your browser or device.** We collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this data to ensure that the Online Services function properly.
* **Your use of the Apps.** We collect certain data when you download and use an App, such as App usage data, the date and time the App on your device accesses our servers and what data and files have been downloaded to the App based on your device number.
* **Pixel Tags and other similar technologies.** We collect data from pixel tags (also known as web beacons and clear GIFs), which are used with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Online Services.
* **Analytics.** We collect data through Google Analytics and Adobe Analytics, which use cookies and technologies to collect and analyse data about use of the Services. These services collect data regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to [**www.google.com/policies/privacy/partners/**](https://www.starwoodhotels.com/preferredguest/legal/www.google.com/policies/privacy/partners/) and opt out by downloading the Google Analytics opt out browser add-on, available at [**https://tools.google.com/dlpage/gaoptout**](https://tools.google.com/dlpage/gaoptout). You can learn more about Adobe and opt out by visiting [**http://www.adobe.com/privacy/opt-out.html**](http://www.adobe.com/privacy/opt-out.html).
* **Adobe Flash technology (such as Flash Local Shared Objects (“Flash LSOs”)) and other similar technologies.** We collect data through Flash LSOs and other technologies on some Websites to, among other things, collect and store data about your use of the Online Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel at [**http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\_manager07.html**](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html). You can also control Flash LSOs by going to the Global Storage Settings Panel at [**http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\_manager03.html**](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager03.html) and following the instructions (which include instructions that explain, for example, how to delete existing Flash LSOs (referred to as “information” on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without your being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including those used with the Online Services. For more information, please refer to [**https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html**](https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html).
* **Your IP Address.** We collect your IP address, a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.
* **Aggregated Data.** We may aggregate data that we collected and this aggregated data will not personally identify you or any other user.

USE OF PERSONAL DATA AND OTHER DATA

We use Personal Data and Other Data to provide you with Services, to develop new offerings and to protect Rishi’s Vision and our members as detailed below. In some instances, we will request that you provide Personal Data or Other Data to us directly. If you do not provide the data that we request, or prohibit us from collecting such data, we may not be able to provide the requested Services.

We use Personal Data and Other Data for our legitimate business interests, including the following:

* **Provide the Services you request.** We use Personal Data and Other Data to provide Services you request, including:
  + To facilitate reservations, payment, send administrative information, confirmations or pre-arrival messages, to assist you with meetings and events and to provide you with other information about the area and the property at which you are scheduled to visit
  + To complete your reservation and stay, for example, to process your payment, ensure that your room is available and provide you with related customer service
  + To support our electronic receipt program. When you provide an email address in making a reservation, we use that email address to send you a copy of your bill. If you make a reservation for another person using your email address, that person's bill will be emailed to you, as well. You can opt out of receiving your bill via email and instead receive a paper copy by contacting the reception desk

We will use Personal Data and Other Data to manage our contractual relationship with you, because we have a legitimate interest to do so and/or to comply with a legal obligation.

* **Personalize the Services according to your Personal Preferences.** We use Personal Data and Other Data to personalize the Services and improve your experiences, including when you contact our centre, visit one of our properties or use the Online Services, to:
  + Customize your experience according to your Personal Preferences
  + Present offers tailored to your Personal Preferences

We will use Personal Data and Other Data to provide personalized Services according to your Personal Preferences either with your consent or because we have a legitimate interest to do so.

* **Communicate with you about goods and services according to your Personal Preferences.** We use Personal Data and Other Data to:
  + Send you marketing communications and promotional offers, as well as periodic customer satisfaction, market research or quality assurance surveys

We will use Personal Data and Other Data in this way with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.

* **Business Purposes.** We use Personal Data and Other Data for data analysis, audits, security and fraud monitoring and prevention (including with the use of closed circuit television, card keys, and other security systems), developing new goods and services, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

We use Personal Data and Other Data in this way to manage our contractual relationship with you, comply with a legal obligation and/or because we have a legitimate interest to do so.

DISCLOSURE OF PERSONAL DATA AND OTHER DATA

Our goal is to provide you with the highest level of Services, and to do so, we share Personal Data and Other Data with the following:

* **Strategic Business Partners.** We disclose Personal Data and Other Data with select Strategic Business Partners who provide goods, services and offers that enhance your experience at our properties or that we believe will be of interest to you. By sharing data with these Strategic Business Partners, we are able to make personalized services and unique travel experiences available to you. For example, this sharing enables Yoga Classes, Meditation and other services at our properties. This sharing also enables us to provide you with a single source for purchasing packages that include Meditation related services, such as Yoga, dis-courses, Video’s and residential packages.
* **Service Providers.** We disclose Personal Data and Other Data to third-party service providers for the purposes described in this Privacy Statement. Examples of service providers include companies that provide website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing and other services.
* **Corporate Reorganization.** We may disclose or transfer your Personal Data and Other Data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Rishi’s Vision.

OTHER USES AND DISCLOSURES

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of the Marriott Group, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law. In some instances, we may combine Other Data with Personal Data (such as combining your name with your location). If we do, we will treat the combined data as Personal Data as long as it is combined.

NON Rishi’s Vision ENTITIES

This Privacy Statement does not address, and we are not responsible for the privacy, data or other practices of any entities outside of Rishi’s Strategic Business Partners or any third party operating any site or service to which the Services link, payment service, loyalty program, or website that is the landing page of the high-speed Internet providers at our properties. The inclusion of a link on the Online Services does not imply endorsement of the linked site or service by us. We have no control over, and are not responsible for, any third party’s collection, use and disclosure of your Personal Data.

In addition, we are not responsible for the data collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through or the Apps or our Social Media Pages.

THIRD PARTY ADVERTISERS

We may use third-party advertising companies to serve advertisements regarding goods and services that may interest you when you access and use the Online Services, other websites or online services. To serve such advertisements, these companies place or recognize a unique cookie on your browser (including through use of pixel tags). If you would like more information about this practice, and to learn about your choices in connection with it, please visit [**http://www.networkadvertising.org/managing/opt\_out.asp**](http://www.networkadvertising.org/managing/opt_out.asp) and [**http://www.aboutads.info/**](http://www.aboutads.info/). To opt out of the practice, you may download the AppChoices app at www.aboutads.info/appchoices.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the *“Contacting Us”* section, below.

LINKS TO OTHER WEB SITES:

In order to anticipate your needs, our website provides links to other web sites and third parties for your convenience and information. We are not responsible for the collection, use, maintenance, sharing or disclosure of data (including personal data) by such third parties. We encourage you to contact these third parties to ask questions about their privacy practices, policies and security measures before disclosing any personal data. We recommend that you review the privacy statements and policies of linked web sites to understand how those web sites collect, use and store information.

CHOICES, ACCESS AND RETENTION

You have choices when it comes to how we use your data and we want to ensure you have the information to make the choices that are right for you.

If you no longer want to receive marketing-related emails, you may opt out by visiting our [**unsubscribe page**](https://www.marriott.com/profile/email/unsubscribeChallenge.mi) at https://www.rishisvision.org/email/unsubscribe or by following the instructions in any such email you receive from us

HOW YOU CAN ACCESS, CHANGE OR SUPPRESS YOUR PERSONAL DATA

If you would like to review, correct, update, suppress, restrict or delete Personal Data that you have previously provided to us, or if you would like to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by law), you can contact us at [**info@rishisvision.org**](mailto:info@rishisvision.org) or by mail:

Rishi’s Vision  
Sunrise House

55 Leeds Road

Little Germany

Bradford BD1 5AF

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have your Personal Data suppressed from our database, or other limitations you would like to put on our use of your Personal Data. For your protection, we only fulfil requests for the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before fulfilling your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we often need to retain certain data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or reservation, or enter a promotion, you may not be able to change or delete the Personal Data provided until after the completion of such purchase, reservation, or promotion). There may also be residual data that will remain within our databases and other records, which will not be removed. In addition, there may be certain data that we may not allow you to review for legal, security or other reasons.

**Retention**

We will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

* The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services)
* Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
* Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations)

SENSITIVE DATA

Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data (e.g., social security numbers, national identification number, data related to racial or ethnic origin, political opinions, religion, ideological or other beliefs, health, biometrics or genetic characteristics, criminal background, trade union membership, or administrative or criminal proceedings and sanctions).

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of sixteen (16), and we request that they not provide Personal Data through the Services.

CROSS-BORDER TRANSFER

Rishi’s Vision is a global organization and provides a global service. Sharing data cross-border is essential to the Services so that you receive the same high-quality service wherever you are in the world. As a result, we will, subject to law, transfer Personal Data and Other Data collected in connection with the Services, to entities in countries where data protection standards may differ from those in the country where you reside. By making a reservation, visiting or attending a Rishi’s Vision organized programme or using any of our services, you understand that we transfer your Personal Data globally.

In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries will be entitled to access your Personal Data.

UPDATES TO THIS PRIVACY STATEMENT

The *“LAST UPDATED”* legend at the top of this page indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the Online Services. Your use of the Services following these changes means that you accept the revised Privacy Statement. If you would like to review the version of the Privacy Statement that was effective immediately prior to this revision, please contact us at [**info@rishisvision.org**](mailto:info@rishisvision.org).

CONTACTING US

If you have any questions about this Privacy Statement, please contact us at [**info@rishisvision.org**](mailto:info@rishisvision.org), or by mail:

Rishi’s Vision  
Sunrise House

55 Leeds Road

Little Germany

Bradford BD1 5AF

Because your email communications to us may not always be secure, please do not include credit card or Sensitive Data in your emails to us.

PRIVACY PREFERENCES

At Rishi’s Vision, we respect your privacy and want to provide you with information and choices. The options provided below allow you to express your preferences: what and how much you share with us and when and how you hear from us.

OTHER PREFERENCES

If you have other preferences, or are looking to exercise your rights under the GDPR, please email us [**info@rishisvision.org**](mailto:info@rishisvision.org), or by mail:

Rishi’s Vision  
Sunrise House

55 Leeds Road

Little Germany

Bradford BD1 5AF

We will work with you to understand and process your request. Please note that we may ask you to verify your identity before taking further action on your request.

USE OF PERSONAL DATA

Any Personal Data sent to us may be used by Marriott U.S. and its Service Providers for the purposes indicated in the Rishi’s Vision Privacy Statement. If we intend to use your Personal Data for a purpose that is materially different from these purposes or if we intend to disclose it to a third party not previously identified, we will notify you and offer you the opportunity to opt-out of such uses and/or disclosures where it involves Personal Data or opt-in where Sensitive Personal Data is involved.

DISCLOSURES TO AFFILIATES AND THIRD PARTIES

Your Personal Data may be disclosed to the following:

* To the Rishi’s Vision Group for the purposes described in this Policy;
* To Service Providers;
* To third parties offering courses, and other services to enhance your experience, such as Strategic Business Partners;

DISCLOSURES TO SERVICE PROVIDERS

We sometimes contract with other companies and individuals to perform functions or services on our behalf such as dis-courses, website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, auditing and other services. They may have access to Personal Data needed to perform their functions, but are restricted from using the Personal Data for purposes other than providing services for us or to us.

DATA SECURITY

We use reasonable physical, electronic, and administrative safeguards to protect your Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the nature of the Personal Data and the risks involved in processing that information.

DATA INTEGRITY AND PURPOSE LIMITATION

We limit the collection and use of Personal Data to the information that is relevant for the purposes of processing and will not process Personal Data in a way that is incompatible with the purposes for which the information has been collected or subsequently authorized by you. We take reasonable steps to ensure the Personal Data is reliable for its intended use, accurate, complete, and current to the extent necessary for the purposes for which we use the Personal Data.

ACCESS TO PERSONAL DATA

You can ask to review, correct, or delete Personal Data that we maintain about you by sending a written request to [info@rishisvision.org](mailto:info@rishisvision.org)

PRIVACY SHIELD ENFORCEMENT AND DISPUTE RESOLUTION

If you have any questions or concerns, please write to us at the address listed below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Data.

DISCLOSURES REQUIRED BY LAW

We may need to disclose Personal Data in response to lawful requests by public authorities for law enforcement or national security reasons or when such action is necessary to comply with a judicial proceeding or court order, or when otherwise required by law.

CONTACT INFORMATION

If you have any questions regarding this Privacy Shield Privacy Policy, please contact us by email at

[**info@rishisvision.org**](mailto:info@rishisvision.org), or please write to the following address

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55 Leeds Road

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PRIVACY POLICY CHANGES

This Policy may be changed from time to time. You can determine when this Policy was last revised by referring to the "LAST UPDATED" legend at the top of this page. Any changes to our Policy will become effective upon our posting of the revised Policy on the Site.