

PRIVACY POLICY

Effective Date: 20 October 2026

At **Ayung Resort Ubud**, operated by **PT. Banyu Mas Sembada**, we are committed to respecting your privacy and protecting the personal information entrusted to us.

This Privacy Policy explains how Ayung Resort Ubud (“**Ayung Resort**”, “**we**”, “**us**”, or “**our**”) collects, uses, processes, stores, and protects personal information when you visit our website, make a reservation, communicate with us, make a payment, stay at our resort, or use our services and facilities.

We are committed to handling personal information responsibly, transparently, and in accordance with applicable privacy and data protection laws and regulations in Indonesia.

1. WHO WE ARE

Ayung Resort Ubud is operated by:

PT. Banyu Mas Sembada
Ayung Resort Ubud
Banjar Begawan, Desa Melinggih Kelod
Payangan, Ubud, Bali 80572
Indonesia

For applicable data protection purposes, Ayung Resort may act as the **Personal Data Controller** for personal information processed in connection with our hospitality, reservation, guest service, website, security, marketing, and business operations.

We may engage trusted third-party service providers to process personal information on our behalf for specific operational purposes.

2. PERSONAL INFORMATION WE COLLECT

The information we collect depends on how you interact with Ayung Resort.

Information You Provide

This may include:

- Full name and title
- Email address
- Telephone or mobile number
- Mailing, residential, or billing address
- Nationality or country of residence where required
- Reservation and booking information
- Arrival and departure dates
- Number of guests
- Room and accommodation preferences
- Special requests and service preferences
- Information submitted through website enquiry or contact forms
- Information communicated through WhatsApp
- Information required to arrange requested services or experiences
- Billing and transaction information
- Information provided when subscribing to marketing communications
- Information required to comply with applicable legal or regulatory requirements

Guest and Stay Information

In connection with your stay, we may process information such as:

- Reservation details
- Check-in and check-out information
- Room information
- Guest preferences
- Special requests
- Service requests
- Dining, spa, activity, or experience requests
- Celebration or occasion information voluntarily provided by you
- Feedback, comments, or complaints
- Billing and transaction records

Identification Information

Where reasonably necessary for check-in, guest registration, security, legal, or regulatory purposes, we may collect or verify information contained in passports, identity cards, or other official identification documents.

Information Collected Automatically

When you visit our website, certain technical information may be collected automatically through cookies and similar technologies.

This may include:

- IP address

- Browser type and version
 - Device type
 - Operating system
 - Date and time of access
 - Pages visited
 - Referring website or source
 - General website interaction information
 - Technical and security-related information
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3. HOW WE USE PERSONAL INFORMATION

We may use personal information to:

- Process and manage reservations
- Provide accommodation and hospitality services
- Communicate with guests regarding reservations and enquiries
- Respond to questions, requests, feedback, or complaints
- Prepare for and manage guest stays
- Provide requested services and experiences
- Understand and accommodate reasonable guest preferences
- Process and confirm payments
- Manage dining, spa, activities, events, celebrations, and other requested services
- Communicate important information relating to your reservation or stay
- Improve our website, services, facilities, and guest experience
- Understand website usage and performance
- Measure and improve digital marketing activities
- Conduct internal administration and operational reporting
- Maintain appropriate business and financial records
- Manage guest and business relationships
- Protect the security of our website, systems, guests, employees, and property
- Detect, prevent, and investigate fraud, misuse, security incidents, or unlawful activity
- Comply with applicable laws, regulations, legal obligations, and lawful requests
- Perform other purposes reasonably related to the above activities

We seek to collect and process information that is relevant and reasonably necessary for the applicable purpose.

4. LEGAL BASIS FOR PROCESSING

Depending on the circumstances and applicable law, we may process personal information where necessary to:

- Provide or manage a reservation or requested service
- Fulfil our contractual obligations
- Comply with legal or regulatory obligations
- Protect the safety or vital interests of individuals where applicable
- Pursue legitimate operational or business interests where permitted
- Obtain your consent where consent is required

Where processing is based on consent, you may withdraw your consent subject to applicable legal or operational limitations.

5. RESERVATIONS AND BOOKING SERVICES

Reservations made through the Ayung Resort website may be processed through **STAAH**, our booking and reservation technology provider.

Information may include your name, contact details, reservation details, stay dates, room selection, number of guests, preferences, special requests, and other information necessary to process and manage your reservation.

STAAH may process personal information on behalf of Ayung Resort in connection with the provision of booking and reservation services.

If you make a reservation through an online travel agency, travel agent, tour operator, or other third-party booking channel, that provider may collect and provide us with information necessary to fulfil your reservation. The third party's own privacy policy may also apply.

6. GUEST INFORMATION AND PROPERTY MANAGEMENT SYSTEM

Certain guest and reservation information may be processed through **VHP**, our property management and hotel operational system.

This may include:

- Guest identification and contact information
- Reservation details
- Arrival and departure information
- Room information
- Guest preferences
- Special requests
- Service information

- Billing and transaction records

Access to guest information is restricted to authorised personnel and authorised service providers based on legitimate operational requirements.

7. PAYMENT PROCESSING

Ayung Resort provides several payment methods, including:

- **Flywire**
- Payment links
- Bank transfer

Flywire

Certain payments may be processed through **Flywire**, our payment service provider.

Flywire may process information necessary to complete and verify transactions, maintain payment security, prevent fraud, and comply with applicable requirements.

When interacting directly with Flywire, its own terms and privacy practices may also apply.

Payment Links

Where a payment link is provided, information submitted through the relevant payment service may be processed by the applicable payment provider for transaction processing and related purposes.

Bank Transfer

For bank transfers, we may process information such as payer name, transaction reference, amount, payment date, and other information reasonably necessary to verify and reconcile the payment.

Ayung Resort does not intentionally store complete payment card details where such information is processed directly by an external payment provider.

8. WEBSITE DEVELOPMENT AND HOSTING

Our website is developed and supported with the assistance of **MindiMedia** and hosted using **Hostinger**.

MindiMedia

MindiMedia may provide website development, maintenance, technical support, integrations, digital services, and related website management.

Where personal information is accessible in connection with these services, access is limited to what is reasonably necessary for the provision and support of the website.

Hostinger

Hostinger provides website hosting and infrastructure services.

Depending on the technical configuration of the website, technical information such as IP addresses, server logs, device and browser information, and security-related information may be processed for website operation, maintenance, and security.

9. WHATSAPP COMMUNICATIONS

Ayung Resort may use **WhatsApp** for:

- General enquiries
- Reservation enquiries
- Reservation assistance
- Guest assistance
- Service-related communication
- Follow-up regarding requests or arrangements

Information communicated through WhatsApp may include your name, telephone number, messages, reservation information, requests, and other information voluntarily provided by you.

WhatsApp operates under its own terms and privacy practices.

For your protection, we recommend that you do not send highly sensitive personal or financial information through WhatsApp unless specifically requested through an appropriate and secure process.

10. MARKETING COMMUNICATIONS

Where permitted by applicable law and, where required, with your consent, Ayung Resort may send information regarding:

- Special offers
- Accommodation packages
- Dining experiences
- Spa services
- Events
- Seasonal experiences
- Exclusive resort experiences
- Resort news and updates

You may opt out of promotional communications at any time through an available unsubscribe mechanism or by contacting us.

Opting out of marketing communications will not affect essential communications relating to an existing reservation, transaction, or stay.

11. GUEST PREFERENCES AND PERSONALISED SERVICES

To provide a thoughtful and personalised guest experience, Ayung Resort may retain relevant information regarding preferences or requests voluntarily provided by guests.

This may include preferences relating to:

- Accommodation
- Dining
- Activities and experiences
- Celebrations
- Special arrangements
- Other requested services

Such information will be used only for appropriate hospitality and service purposes and handled with appropriate care.

12. PHOTOGRAPHY, EVENTS AND GUEST EXPERIENCES

Ayung Resort may provide or host photography sessions, weddings, celebrations, cultural experiences, activities, events, and other guest experiences.

Where identifiable photographs, videos, or other guest media are intended for promotional, advertising, website, social media, or other public-facing purposes, Ayung Resort will seek appropriate permission or consent where required.

Private guest photography or media services may be subject to separate arrangements.

13. COOKIES AND ONLINE TRACKING TECHNOLOGIES

Our website uses cookies and similar technologies to support website functionality, understand website usage, measure performance, and support digital marketing activities.

Our website currently uses or may use technologies including:

Google Tag Manager

Google Tag Manager (GTM) is used to manage and deploy tags and related technologies on the website.

Google Analytics

Google Analytics is used to help us understand how visitors interact with our website, including website usage, traffic sources, pages viewed, interactions, and general website performance.

This information helps us improve our website and digital guest experience.

Google Ads

Google Ads may be used for digital advertising and campaign measurement.

Depending on the configuration of our website and advertising campaigns, related technologies may be used to measure advertising performance and interactions with our advertisements.

Cookies

Cookies and similar technologies may be used for:

- Essential website functionality
- Security
- User preferences
- Website performance
- Analytics
- Understanding website usage

- Advertising and campaign measurement
- Improving digital marketing effectiveness

Some cookies may be provided by third-party service providers.

The specific cookies and technologies used may change as our website and digital services develop.

Where required by applicable law, appropriate consent will be obtained before using non-essential cookies or tracking technologies.

You may manage or restrict cookies through your browser settings. Disabling certain cookies may affect website functionality.

For more information, please refer to our **Cookie Policy**, where available.

14. CCTV AND SECURITY

For the safety and security of guests, employees, visitors, and property, Ayung Resort may operate CCTV and other security systems in selected areas of the resort.

CCTV may be used for:

- Guest and employee safety
- Property security
- Prevention and investigation of incidents
- Prevention of theft, fraud, or unlawful activity
- Security investigations
- Protection of people and property
- Compliance with legal obligations

CCTV is not intended to operate in areas where individuals would reasonably expect a high degree of privacy.

Access to CCTV recordings is restricted to authorised personnel and may be provided to relevant authorities where legally required or permitted.

CCTV information will be retained only for as long as reasonably necessary, subject to applicable operational, security, and legal requirements.

15. GUEST WI-FI

Ayung Resort provides Wi-Fi access primarily for guest internet connectivity.

Connecting to the guest Wi-Fi does not require guests to provide their name or detailed guest profile solely for the purpose of obtaining access.

Certain technical information may nevertheless be processed by the relevant network or technology infrastructure as reasonably necessary to provide connectivity, maintain network performance, troubleshoot technical issues, and protect the network from misuse or security threats.

16. THIRD-PARTY SERVICE PROVIDERS

Ayung Resort may engage trusted third-party service providers to support our hospitality, reservation, payment, website, marketing, communication, and operational activities.

These may include:

Service Provider	Purpose
STAAH	Booking and reservation technology
VHP	Property management and hotel operational systems
Flywire	Payment processing
MindiMedia	Website development, maintenance, and digital services
Hostinger	Website hosting and infrastructure
WhatsApp	Guest communication and messaging
Google Tag Manager	Website tag management
Google Analytics	Website analytics and performance measurement
Google Ads	Digital advertising and campaign measurement

We may also use other trusted providers where reasonably necessary for website security, information technology, communications, professional services, operational support, or other legitimate business purposes.

Third-party providers are expected to process personal information only for appropriate purposes and to maintain reasonable safeguards appropriate to the nature of the information.

Ayung Resort does **not sell personal information** to third parties.

17. THIRD-PARTY WEBSITES AND SERVICES

Our website may contain links or integrations to third-party websites or services, including booking platforms, payment providers, social media platforms, advertising platforms, or other external services.

Once you interact directly with a third-party website or service, that third party's own terms and privacy practices may apply.

Ayung Resort is not responsible for the privacy practices of third-party websites or services that we do not control.

We encourage you to review the privacy policies of relevant third-party providers before providing personal information to them.

18. INTERNATIONAL DATA PROCESSING

Some of our service providers, technology providers, payment providers, communication platforms, analytics providers, advertising platforms, or other third-party partners may process personal information outside Indonesia.

Where personal information is transferred, accessed, or processed internationally, Ayung Resort will take reasonable steps to ensure appropriate safeguards are applied in accordance with applicable data protection requirements.

19. DATA SECURITY

Ayung Resort takes reasonable technical, organisational, and administrative measures designed to protect personal information against:

- Unauthorised access
- Unauthorised disclosure
- Unauthorised alteration
- Misuse
- Loss
- Destruction
- Security incidents
- Other unlawful or unauthorised processing

Access to personal information is limited to personnel and service providers who have a legitimate operational need to access it.

While we take reasonable measures to protect personal information, no method of electronic transmission or storage can be guaranteed to be completely secure.

20. PERSONAL DATA INCIDENTS

In the event of a personal data security incident affecting personal information under our control, Ayung Resort will take reasonable steps to investigate, contain, mitigate, and address the incident.

Where required by applicable law, we will provide notifications or take other actions required by law in relation to affected individuals, authorities, or other relevant parties.

21. DATA RETENTION

We retain personal information only for as long as reasonably necessary for the purposes for which it was collected, including to:

- Provide services
- Manage reservations and guest relationships
- Maintain business and financial records
- Fulfil legal and regulatory obligations
- Resolve disputes
- Protect legitimate business interests
- Maintain appropriate operational records
- Meet security and fraud-prevention requirements

When personal information is no longer reasonably required, it may be securely deleted, destroyed, anonymised, or otherwise disposed of in accordance with applicable requirements.

Certain information may be retained for longer where required by law or legitimate operational requirements.

22. YOUR PRIVACY RIGHTS

Subject to applicable law, you may have rights in relation to your personal information, including the right to:

- Obtain information about how your personal information is processed
- Request access to your personal information

- Request correction or updating of inaccurate information
- Request deletion or destruction of personal information where legally applicable
- Withdraw consent where processing is based on consent
- Request restriction of certain processing where applicable
- Object to certain processing where applicable
- Request information regarding the processing of your personal information
- Submit a complaint or request relating to the processing of your personal information

Certain rights may be subject to legal exceptions, verification requirements, contractual obligations, legitimate business requirements, or other applicable limitations.

To protect personal information, we may need to verify your identity before responding to a privacy request.

23. CHILDREN'S PRIVACY

Our website and hospitality services are primarily intended for adults and families.

Where children stay at or use our facilities, we may process limited information about them where reasonably necessary to provide accommodation, services, safety, reservations, activities, or to comply with applicable legal requirements.

We do not knowingly seek to collect personal information from children beyond what is reasonably necessary for legitimate hospitality, safety, legal, or operational purposes.

24. DISCLOSURE REQUIRED BY LAW

Ayung Resort may disclose personal information where reasonably necessary or legally required, including in connection with:

- Applicable laws and regulations
- Lawful requests from government authorities
- Court orders or legal proceedings
- Regulatory requirements
- Protection of guests, employees, visitors, or property
- Fraud prevention
- Security investigations
- Prevention or investigation of unlawful activity
- Protection of Ayung Resort's legal rights

Any disclosure will be limited to what is reasonably necessary or required under the applicable circumstances.

25. ACCURACY OF PERSONAL INFORMATION

We seek to maintain personal information that is accurate, complete, relevant, and reasonably up to date for the purposes for which it is processed.

You are encouraged to provide accurate information and to notify us if information you have provided changes or is inaccurate.

26. PROVIDING INFORMATION ON BEHALF OF OTHERS

When providing personal information relating to another person, including another guest, you should ensure that you are authorised to provide that information and that the relevant person has been appropriately informed where required by applicable law.

This may apply when making a reservation for family members, colleagues, friends, wedding parties, groups, or other guests.

27. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in:

- Our services and operations
- Website functionality
- Technology
- Third-party service providers
- Legal or regulatory requirements
- Privacy and data protection practices

When we make material changes, we may update the effective date displayed at the beginning of this Privacy Policy and take additional steps where required by applicable law.

We encourage you to review this Privacy Policy periodically.

28. CONTACT US

If you have questions about this Privacy Policy, wish to exercise your privacy rights, or would like to submit a privacy-related request, please contact us:

Ayung Resort Ubud
Operated by PT. Banyu Mas Sembada
Banjar Begawan, Desa Melinggih Kelod
Payangan, Ubud, Bali 80572
Indonesia

Telephone: +62 361 900 1333

Email: reservations@ayungresortubud.com

When submitting a privacy request, please provide sufficient information for us to understand your request and verify your identity where necessary.

We will handle privacy requests in accordance with applicable law and within the applicable timeframes.

YOUR PRIVACY MATTERS

At Ayung Resort Ubud, we believe that a refined guest experience begins with respect — for our guests, our community, and the personal information entrusted to us.

We are committed to treating personal information with care, discretion, and respect throughout every stage of the guest journey.