TERRA AGUA CEU

Customer Privacy and Confidentiality Policy

Protecting the personal information, privacy and trust of every client

Effective date	01 June 2026
Policy owner	Management, Terra Agua Ceu
Review cycle	Whenever legal, regulatory or operational requirements change

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1. Policy Statement

Terra Agua Ceu (“TAC”, “the Company”) is an inbound tour operator offering diving and safari experiences in Mozambique. In planning and delivering these experiences, the Company necessarily receives and handles personal information entrusted to it by its clients. TAC regards the protection of that information as a fundamental obligation to its clients and an integral element of responsible and sustainable business conduct.

The Company is committed to collecting, using, sharing, storing and disposing of client information lawfully, fairly, transparently and securely, and to respecting the privacy and dignity of every client throughout their engagement with TAC. This commitment forms part of the Company’s sustainability management system and its adherence to the customer protection requirements of the Travelife for Tour Operators and Travel Agencies certification programme.

2. Purpose and Objectives

This Policy sets out the principles, standards and responsibilities that govern the handling of client information at Terra Agua Ceu. Its objectives are to:

- safeguard the personal and confidential information of clients and prospective clients;
- ensure that client information is processed only for legitimate, clearly defined and lawful purposes;
- ensure compliance with applicable data protection and privacy legislation, contractual obligations and recognised industry standards;
- define the obligations of TAC personnel and business partners in relation to client confidentiality;
- establish clear procedures for responding to client requests, complaints and personal data incidents; and
- demonstrate TAC’s accountability to clients, partners and certification bodies, including Travelife.

3. Scope and Application

This Policy applies to all personal and confidential information relating to clients, prospective clients and their travelling companions, irrespective of the format in which it is held (electronic, paper, photographic, audio or verbal) and irrespective of whether it was obtained directly from the client or from a travel agent, tour operator or other intermediary.

The Policy is binding on all persons who act for, or on behalf of, Terra Agua Ceu, including:

- permanent, fixed-term and temporary employees;
- travel and reservations consultants and sales personnel;
- tour leaders, dive instructors, guides and local representatives;
- drivers and transfer personnel;
- interns and volunteers;
- contractors and consultants; and

- any other person authorised to represent the Company.

Where client information is shared with business partners, including accommodation establishments, transport providers, dive centres, excursion and activity operators, and partner agencies, TAC will require those partners to protect it to a standard consistent with this Policy (see Section 9).

Compliance with this Policy is mandatory.

4. Definitions

For the purposes of this Policy, the following terms bear the meanings set out below.

Term	Meaning
Client	Any person who books, enquires about, participates in or travels on a service arranged by TAC, including travelling companions and minors.
Personal information	Any information relating to an identified or identifiable natural person, including names, contact details, identification numbers, travel details, images and correspondence.
Sensitive personal information	Personal information that requires a heightened level of protection, including health and medical information, dietary or religious requirements, accessibility needs, passport and identity documents, financial and payment details, and information relating to children.
Confidential information	Any information concerning a client that is not publicly available, including personal circumstances, conversations and observations made in the course of delivering a service.
Processing	Any operation performed on personal information, including its collection, recording, storage, use, disclosure, transfer, retention and destruction.
Business partner	Any third party engaged by TAC to deliver or support a client service, including accommodation, transport, dive, excursion and activity providers, partner agencies and IT service providers.
Personal data incident	Any actual or suspected loss, theft, unauthorised access, disclosure, alteration or destruction of client information.
Personnel	All persons to whom this Policy applies under Section 3.

5. Legal and Regulatory Framework

TAC processes client information in accordance with all applicable laws and regulatory requirements, which include, as relevant:

- the Constitution of the Republic of Mozambique, which protects the right to privacy, personal image and reputation;
- the Electronic Transactions Law of Mozambique (Law No. 3/2017) and its regulations, insofar as they govern the processing of personal data in electronic form;
- any dedicated personal data protection legislation enacted in Mozambique, which TAC will adopt upon its entry into force;
- foreign data protection legislation that applies to the Company's handling of the personal information of international clients, including, where applicable, the European Union General Data Protection Regulation (GDPR) and the United Kingdom GDPR;
- the data protection and confidentiality obligations contained in TAC's agreements with international tour operators, travel agents and other partners; and
- the customer protection requirements of the Travelife for Tour Operators and Travel Agencies standard.

6. Principles of Information Handling

All processing of client information by TAC is governed by the following principles:

- Information is processed lawfully and fairly, and clients are informed of how and why their information is used.
- Information is collected for specified, legitimate purposes and is not used in a manner incompatible with those purposes.
- Only information that is adequate, relevant and necessary for the stated purpose is collected and shared.
- Reasonable steps are taken to ensure that information is accurate and, where necessary, kept up to date.
- Information is retained no longer than is necessary for the purpose for which it was obtained or as required by law.
- Information is protected by appropriate technical and organisational measures against unauthorised access, loss or disclosure.
- TAC is responsible for, and can demonstrate, compliance with these principles.

7. Collection and Use of Client Information

7.1 Categories of information

TAC collects only such client information as is reasonably required to plan, book, manage and deliver the requested travel services and to discharge its duty of care. This typically includes:

Category	Examples
Identity and contact details	Full name, date of birth, nationality, postal and email address, telephone number
Travel documentation	Passport and visa details, identity documents, flight information

Category	Examples
Booking and itinerary details	Accommodation, transfers, activities, diving certifications and logged experience, special requests
Health, dietary and accessibility information	Medical declarations (including dive fitness), allergies, dietary requirements, mobility or accessibility needs
Financial information	Payment records, invoices and, where applicable, card or bank details
Emergency contacts	Name and contact details of a nominated next of kin or emergency contact
Images and recordings	Photographs or video taken during excursions, where consent has been given
Correspondence and feedback	Emails, messages, reviews, complaints and satisfaction surveys

7.2 Purposes of use

Client information is used solely for the following purposes:

- preparing quotations and confirming, administering and delivering bookings;
- arranging services with accommodation, transport, dive and activity providers;
- ensuring client safety and well-being, including emergency response and incident management;
- complying with legal, regulatory, immigration, tax and accounting obligations;
- responding to enquiries, feedback and complaints, and improving service quality; and
- sending marketing communications, only where the client has given prior consent.

Client information shall not be sold, rented or otherwise made available to any third party for that party's own marketing purposes.

8. Transparency, Consent and Sensitive Information

8.1 Informing clients

At or before the point of booking, TAC informs clients, directly or through the booking intermediary, of the information it collects, the purposes for which it is used, the categories of business partners with whom it is shared and the rights available to clients. This Policy, or a privacy notice derived from it, is made publicly available on the Company's website.

8.2 Consent

Where processing relies on consent, including for marketing communications and the use of client images, consent shall be specific, informed and freely given, and shall be recorded. Clients may withdraw their consent at any time, without detriment to the services they have booked.

8.3 Sensitive personal information

Sensitive personal information is collected only where it is necessary for the safe delivery of the service or required by law, and is accessible only to personnel and business partners who require it for that purpose. Particular care shall be exercised in handling:

- medical and dive-fitness declarations, which shall be shared only with the relevant dive centre, activity provider or emergency responder;
- passport and identity documents, which shall not be copied, photographed or retained except where operationally or legally required;
- payment information, which shall be processed only through secure, authorised channels; and
- information relating to children, which shall be collected through, and with the agreement of, a parent or legal guardian.

9. Disclosure to Business Partners and Third Parties

The delivery of a tour necessarily involves the sharing of certain client information with business partners. TAC shall ensure that:

- only the minimum information necessary for the partner to deliver its service is disclosed;
- information is transmitted through secure and authorised communication channels;
- business partners are contractually required, through supplier agreements or the Company's Supplier Code of Conduct, to keep client information confidential, to use it solely for the agreed service and to protect it to a standard consistent with this Policy; and
- where information is transferred across national borders, appropriate safeguards are applied in accordance with applicable law and contractual requirements.

Client information shall not otherwise be disclosed to any third party without the client's consent, except where disclosure is required by law, requested by a competent public authority acting within its legal mandate, or necessary to protect the vital interests of the client or another person in an emergency.

10. Information Security, Retention and Disposal

10.1 Electronic information

- Client records shall be held in secure, password-protected systems, with access restricted to authorised personnel on a need-to-know basis.
- Devices used to access client information, including mobile telephones used by guides and drivers, shall be protected by a password, PIN or biometric lock.
- Client information shall not be stored in, or forwarded to, personal email accounts, personal cloud storage, social media platforms or other unauthorised channels.
- Personnel shall verify recipients before sending emails or messages containing client information, in order to prevent misdirected communications.

- Where messaging applications are used for operational purposes, only Company-approved groups and accounts shall be used, and client information shared shall be limited to that which is operationally necessary.

10.2 Physical records

- Printed documents containing client information, including rooming lists, manifests and passenger lists, shall be kept secure and shall not be left unattended in vehicles, public areas or at activity sites.
- Physical records shall be stored in lockable cabinets or rooms when not in use.

10.3 Retention and disposal

Client information shall be retained only for as long as is necessary to fulfil the purposes for which it was collected, to resolve any outstanding matters, and to satisfy statutory record-keeping obligations (including accounting and tax requirements). Thereafter, it shall be securely deleted or anonymised. Paper records shall be destroyed by shredding or another confidential disposal method.

11. Photography, Video and Media

- No member of personnel may photograph, record, publish or distribute images or recordings of clients for marketing, promotional or personal purposes without the client's prior consent.
- Where client images are to be used in TAC marketing materials, written consent shall be obtained and recorded before publication.
- A client's decision not to be photographed or recorded shall be respected at all times.
- Images of children shall not be used for any purpose without the express written consent of a parent or legal guardian, and shall never be used in a manner that discloses the child's identity or location.
- Particular care shall be exercised in situations in which clients may reasonably expect privacy.

12. Confidentiality in Client Interactions

Information learned, overheard or observed while serving or accompanying clients, whether in the office, during transfers, on excursions, on dive boats or at accommodation establishments, is confidential. Personnel shall not discuss any client's personal or family circumstances, financial position, health, relationships, private conversations or other sensitive matters with colleagues, other clients, suppliers, community members or any other third party, unless disclosure is legitimately required for the delivery of the client's services or for reasons of safety.

Guides, tour leaders and drivers, who are in the closest and most sustained contact with clients, shall exercise particular discretion. Personal judgements, gossip or inappropriate remarks concerning clients are strictly prohibited.

13. Digital Communication and Social Media

The standards of confidentiality and professionalism that apply in face-to-face interactions apply equally to digital communication. Personnel shall not:

- post or share client photographs, messages, itineraries, contact details or personal circumstances on personal social media accounts or in informal messaging groups;
- identify, tag or locate clients online without their consent;
- disclose confidential client or Company information in any online forum; or
- publish real-time location information that could compromise the privacy or security of clients.

Only personnel expressly authorised by Management may communicate publicly on behalf of Terra Agua Ceu.

14. Client Rights

Subject to applicable law, clients are entitled to:

- be informed of how their personal information is collected and used;
- request access to the personal information that TAC holds about them;
- request the correction of inaccurate or incomplete information;
- request the deletion of their information where it is no longer required, subject to legal retention obligations;
- object to, or withdraw consent for, marketing communications and the use of their images at any time; and
- lodge a complaint with TAC and, where applicable, with a competent supervisory authority.

Requests may be submitted in writing to **[privacy contact email address]**. TAC will verify the identity of the requester and respond within a reasonable period, and in any event within any time limit prescribed by applicable law.

15. Personal Data Incident Management

Any actual or suspected personal data incident shall be reported to Management immediately upon discovery, and in any event within 24 hours. Examples include:

- the loss or theft of a device, document or file containing client information;
- information sent to an incorrect recipient;
- unauthorised access to Company systems or accounts;
- the unauthorised sharing or publication of client photographs or information; and
- any other unauthorised use or disclosure of client information.

Upon receipt of a report, Management shall:

(1) contain the incident and limit any further disclosure or loss;
(2) assess the nature, scope and potential impact of the incident on affected clients;

(3) notify affected clients, partners and competent authorities without undue delay, where required by law or where the incident is likely to cause harm;

(4) record the incident, its cause and the actions taken in the Company's incident register; and

(5) implement corrective and preventive measures to avoid recurrence.

All incidents shall be investigated fairly and confidentially.

16. Roles and Responsibilities

Role	Responsibilities
Management	Approves this Policy, allocates the necessary resources, oversees its implementation and is accountable for the management of personal data incidents.
Sustainability Coordinator	Integrates this Policy into the Company's Travelife sustainability management system, maintains supporting records and evidence, coordinates training and reports on performance to Management.
Managers and supervisors	Ensure that personnel within their areas of responsibility understand and comply with this Policy, and reinforce its standards in daily operations.
All personnel	Handle client information in accordance with this Policy, complete the required training, and report incidents and concerns promptly.
Business partners	Protect client information shared with them in accordance with their contractual obligations and the standards set out in this Policy.

17. Training and Awareness

All personnel shall be introduced to this Policy upon induction and shall receive training appropriate to their role, covering client confidentiality and data protection, secure communication practices, the responsible use of photography and social media, and incident reporting. Refresher training shall be provided periodically and whenever this Policy or the applicable legal requirements change. Records of training shall be maintained as part of the Company's sustainability management system.

18. Non-Compliance

A breach of this Policy may constitute serious misconduct. Depending on the nature and gravity of the breach, corrective measures may include additional training, counselling, formal warnings, suspension, the termination of employment or contractual arrangements, and, where appropriate, referral to the competent authorities. Disciplinary action shall be undertaken in accordance with applicable labour legislation and the Company's disciplinary procedures.

Business partners who fail to protect client information may be subject to the review, suspension or termination of their contractual relationship with TAC.

19. Enquiries and Complaints

Clients and stakeholders who have questions about this Policy, or who wish to raise a concern about the handling of their personal information, may contact the Company at **[privacy contact email address]** or **[telephone number]**. All complaints will be acknowledged, investigated and responded to in accordance with the Company's complaints procedure, and the outcome will be communicated to the complainant.

20. Communication, Monitoring and Review

This Policy is communicated to all personnel, made available to clients through the Company's website and booking documentation, and shared with business partners on request. Its implementation is monitored through incident records, client feedback and complaints, and periodic internal review.

The Policy shall be reviewed at least annually, and whenever legal, regulatory or operational requirements change, including upon the entry into force of personal data protection legislation in Mozambique. Each review shall be documented as part of the Company's Travelife sustainability management system.

Annex A: Alignment with the Travelife Framework

The table below indicates how this Policy supports the principal themes of the Travelife for Tour Operators and Travel Agencies standard. It is intended to assist auditors and stakeholders in locating relevant provisions.

Travelife theme	How this Policy responds	Policy sections
Sustainability management and legal compliance	Documented, approved policy with defined ownership; identification of applicable law; annual review; integration into the sustainability management system	1, 5, 16, 20
Internal management (personnel)	Clear duties for personnel; induction and refresher training; disciplinary consequences for non-compliance	12, 13, 17, 18
Customer communication and protection	Transparency at booking; consent; protection of sensitive information; client rights; complaints handling; publicly available policy	7, 8, 10, 14, 19, 20

Travelife theme	How this Policy responds	Policy sections
Business partners and supply chain (partner agencies, accommodation, transport, excursions)	Minimum necessary disclosure; contractual confidentiality obligations; secure transmission; consequences for partner non-compliance	9, 18
Tour leaders, local representatives and guides	Specific discretion obligations; secure handling of manifests and devices in the field	10, 12
Destinations and child protection	Strict rules on images and information relating to children; respect for privacy in host communities	8.3, 11

Annex B: Personnel Confidentiality Undertaking

I confirm that I have read and understood the Terra Agua Ceu Customer Privacy and Confidentiality Policy. I undertake to handle all client information in accordance with its requirements, both during and after my engagement with the Company, and I understand that a breach of this Policy may result in disciplinary or contractual action.

Full name	Lorien Holley
Position	Operations manager
Signature	
Date	30 October 2026
Manager / Supervisor	