Customer Confidentiality, Privacy and Staff Conduct Policy

POLICY OWNER

Management

APPLIES TO

All employees, guides, drivers, consultants, contractors, interns and representatives

REVIEW FREQUENCY

When operational or legal requirements change

1. Purpose

Safari B (SAFARI B) is committed to protecting the privacy, dignity, safety and trust of every client who engages its services. As an inbound tour operator, SAFARI B handles personal and travel-related information and works closely with accommodation establishments, transport providers, guides, activity operators and other tourism partners. Maintaining confidentiality and consistently high standards of professional conduct is therefore essential to the company's reputation and its clients' experience. This policy establishes the standards expected from all SAFARI B personnel in relation to:

- client confidentiality and protection of personal information;
- professional and ethical conduct;
- responsible communication;
- appropriate interaction with clients, colleagues, suppliers and communities;
- safety and responsible tourism practices; and
- the handling and reporting of breaches of confidentiality or conduct.

2. Scope

This policy applies to all persons acting for or representing Safari B, including:

- permanent and temporary employees;
- travel consultants and sales personnel;
- tour leaders and guides;
- drivers and transfer personnel;
- interns and volunteers;
- contractors and consultants; and
- any other representative authorised to act on behalf of SAFARI B.

The policy applies to interactions with clients, prospective clients, suppliers, accommodation providers, activity operators, agents, local communities and other business partners. Compliance with this policy is mandatory.

3. Client confidentiality

3.1 Collection and Use of Information

Client information shall only be collected where it is reasonably required to plan, book, manage or deliver the requested travel service. Staff shall:

- collect only information necessary for legitimate business and operational purposes;
- use client information only for the purpose for which it was obtained;
- treat all personal and sensitive information as confidential;
- limit access to people who reasonably require the information to perform their duties; and
- ensure that information shared with suppliers or partners is limited to what is necessary for the delivery of the client's arrangements.

Client information shall not be disclosed, sold, distributed, or otherwise shared with unauthorized people without appropriate consent, except where disclosure is required by law.

3.2 Storage and Handling of Information

Electronic client records must be appropriately secured and accessible only to authorised personnel. Staff must exercise particular care when handling:

- passport and identification documents;
- flight and accommodation information;
- payment and financial information;
- medical and dietary information;
- travel itineraries;
- emergency contact details; and
- correspondence containing confidential information.

Store printed documents containing personal information securely and dispose of them through appropriate confidential disposal methods when no longer required. Sensitive information must not be unnecessarily copied, forwarded or shared through personal email accounts, social media platforms or other unauthorised communication channels. Staff must take reasonable precautions when communicating through email, messaging applications or mobile devices to prevent information from being sent to unintended recipients.

3.3 Photography, Video and Media

No staff member may photograph, record, publish or distribute images or recordings of clients for marketing, promotional or personal purposes without appropriate consent. Where client photographs or videos are approved for marketing purposes, SAFARI B must ensure that the necessary permission has been obtained before publication. Staff must respect a client's decision not to be photographed or recorded. Particular care must be exercised when images involve children or situations in which clients may reasonably expect privacy.

3.4 Conversations and Personal Observations

Information learned, overheard, or observed while accompanying clients must be treated as confidential. Staff must not discuss a client's:

- family or personal circumstances;
- financial position;
- health or medical information;
- travel habits;
- private conversations;
- personal relationships; or
- other sensitive matters

with colleagues or third parties unless disclosure is legitimately required for the delivery of the client's services or for safety purposes. Inappropriate discussion concerning clients is strictly prohibited.

4. Conduct of sales and travel consultants

4.1 Accuracy and Transparency

All quotations, itineraries, travel information and representations made to clients must be accurate, transparent and made in good faith. Staff must not knowingly exaggerate, conceal or misrepresent:

- accommodation standards;
- travel times and distances;
- activities and excursions;
- inclusions and exclusions;
- transport arrangements;
- pricing;
- availability;
- environmental or wildlife experiences; or
- any other component of a client's itinerary.

Where services are provided by third-party operators, clients must be given accurate information regarding the nature of those arrangements.

4.2 Professional Client Engagement

All client communication must be handled promptly, respectfully and professionally. Staff shall demonstrate patience, courtesy and cultural sensitivity when communicating with clients from different countries and backgrounds. Clients must not be subjected to undue pressure, misleading sales practices or coercion when making purchasing decisions. Any error in a quotation, reservation or itinerary must be reported and addressed promptly.

4.3 Fair Competition

SAFARI B staff shall compete fairly and professionally. Employees must not make misleading, insulting or unsubstantiated statements about competitors, suppliers or other tourism businesses. Client discussions should focus on the quality, value and suitability of SAFARI B's own services.

4.4 Conflicts of Interest, Gifts and Commissions

Staff may not seek or receive undisclosed personal commissions, payments, gifts or other benefits from clients, suppliers or business partners in exchange for preferential treatment or business referrals.

Any potential conflict between an employee's personal interests and the interests of SAFARI B must be disclosed to management.

5. Conduct of tour guides, tour leaders and drivers

5.1 Representation of Safari B

Guides, drivers and tour leaders are ambassadors of Safari B and must maintain a high standard of professionalism throughout every client interaction. This includes:

- punctuality;
- appropriate personal presentation;

- respectful communication;
- preparedness;
- reliability;
- responsible behaviour; and
- appropriate conduct in public and in the presence of clients.

5.2 Confidentiality and Discretion

Client information obtained during a journey or activity must not be discussed with other clients, suppliers, community members or unauthorised third parties. Personal judgments, gossip or inappropriate comments about clients are prohibited.

5.3 Safety and Duty of Care

The safety and well-being of clients must remain a priority during transfers, excursions and other activities. Staff must:

- comply with applicable safety procedures;
- communicate relevant safety information clearly;
- report hazards or incidents promptly;
- exercise appropriate judgement in changing weather, road, marine or wildlife conditions; and
- follow instructions and safety requirements established by SAFARI B and authorised activity providers.

The consumption of alcohol or use of illegal drugs while on duty is strictly prohibited. No person may perform safety-sensitive duties while impaired.

5.4 Cultural, Environmental and Community Respect

SAFARI B personnel must encourage responsible tourism and respectful interaction with Namibia's people, cultures, wildlife, marine environments and natural resources. Guides and other staff shall encourage clients to:

- respect local customs and traditions;
- avoid behaviour that may offend or exploit host communities;
- avoid disturbing or damaging wildlife and natural habitats;
- comply with protected-area and marine conservation requirements;
- minimise waste and unnecessary resource consumption; and
- support responsible and ethical tourism experiences.

Discriminatory, degrading or culturally insensitive language or behaviour by SAFARI B personnel will not be tolerated.

5.5 Handling of Client Property

Staff must not use, borrow or handle a client's belongings without permission, except where necessary for safety or with the client's express consent. Lost or unattended property must be reported immediately and handled in accordance with SAFARI B procedures. Employees may not retain property believed to belong to a client.

6. General staff conduct

All SAFARI B personnel are expected to act honestly, responsibly and with integrity. Staff shall:

- treat clients, colleagues, suppliers and community members with dignity and respect;
- maintain appropriate professional boundaries;
- avoid conduct that may damage SAFARI B's reputation;
- communicate respectfully, including on digital platforms and social media;
- protect company and client information;
- use company property responsibly;
- avoid harassment, intimidation, bullying or abusive behaviour;
- avoid discrimination on inappropriate grounds;
- refrain from soliciting personal benefits from clients; and
- report serious misconduct or unethical behaviour to management.

Harassment, threats, intimidation, exploitation or abuse of any client, colleague or community member may constitute serious misconduct and may result in disciplinary action.

7. Digital communication and social media

Staff must exercise the same standards of confidentiality and professionalism in digital communication as they would in face-to-face interactions. Client photographs, messages, itineraries, contact details or personal circumstances must not be posted on personal social media accounts or shared in informal messaging groups without appropriate authorisation. Staff must not make online comments that:

- disclose confidential information;
- identify clients without permission;
- misrepresent SAFARI B;
- damage the legitimate interests or reputation of SAFARI B;
- discriminate against or harass another person; or
- compromise relationships with clients, communities or business partners.

Only authorised personnel may communicate publicly on behalf of Safari B.

8. Compliance with laws and company requirements

All staff must comply with applicable laws and regulatory requirements relating to:

- privacy and personal information;
- consumer protection;
- tourism operations;
- employment and workplace conduct;
- transport and safety;
- environmental protection; and
- other requirements relevant to their duties.

Where SAFARI B operates across national borders or works with international clients and agents, staff must also comply with applicable contractual and data-handling requirements associated with those relationships. Where the requirements of this policy exceed minimum legal requirements, staff are expected to follow SAFARI B's internal standard unless doing so conflicts with applicable law.

9. Reporting and breach of policy

Any suspected or confirmed breach of client confidentiality or professional conduct must be reported promptly to management. Examples of breaches include:

- unauthorised disclosure of client information;
- loss or misuse of personal data;
- inappropriate sharing of client photographs;
- theft or misuse of client property;
- harassment or abusive behaviour;
- intoxication while on duty;
- deliberate provision of misleading information;
- serious safety negligence;
- undisclosed conflicts of interest; or
- any other conduct that may place clients, colleagues or the reputation of SAFARI B at risk.

Management should assess reported incidents fairly and confidentially. Where appropriate, corrective measures may include counselling, additional training, formal warnings, suspension, termination of employment or contractual arrangements, or referral to the appropriate authorities.

Disciplinary action shall be undertaken in accordance with applicable employment requirements and SAFARI B procedures.

10. Training and awareness

SAFARI B shall ensure that employees and other relevant representatives are made aware of this policy. Training may include:

- confidentiality and data protection;
- professional client service;
- responsible tourism;
- cultural sensitivity;
- health and safety;
- appropriate use of social media;
- incident reporting; and
- ethical workplace conduct.

Refresher training shall be undertaken periodically and where operational requirements or policy changes make additional training necessary. Managers and supervisors are responsible for reinforcing these standards within their respective areas of responsibility.

11. Acknowledgement and commitment

All employees and relevant representatives of Safari B are required to read and understand this policy and comply with its requirements. Where required by management, staff shall sign an acknowledgement confirming their understanding and acceptance of the policy. Safari B is committed to safeguarding the trust of its clients and maintaining professional, ethical and responsible tourism practices throughout its operations.

Staff acknowledgement

I confirm that I have read and understood the Safari B Customer Confidentiality and Staff Conduct Policy.

I understand the standards expected of me and agree to comply with the requirements of this policy while performing duties for or representing Safari B.

Employee	Bianca Jordaan
Position	Owner
Signature	BJordaan.
Date	20/10/2026.

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