

Spotery Privacy Policy

Last updated: October 2022

Welcome to Spotery, an online marketplace for short term rental of facilities provided by Social Solutions, LLC (the “Company”, “SSL”, “Spotery”, “us”, “our”, and/or “we”). We are committed to ensure that the personal information that you share on our Site and/or Services is protected and kept confidential. By accepting the Terms of Service or providing information through our Site or mobile application, you agree to the use and disclosure of personal identifiable information, as detailed in this Privacy Policy.

I. Key Terms

Unless otherwise defined in this Privacy Policy, capitalized terms shall have the meaning set forth on the Terms of Use.

II. Information Collected

1. Information Collected from your use

We ask for and collect the following personal information about you when you use the Site. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations and given our legitimate interest in being able to provide and improve the functionalities of the Site and Services. Without it, we may not be able to provide you with all the requested services.

- **Account Information.** When you sign up for a Spotery Account, we require certain information such as your first name, last name and email address. After registration, we may also ask for date of birth if your use has minimum or maximum ages, or it is required by our contract to obtain information on types of users.
- **Profile and Listing Information.** To use certain features of the Site (such as booking or creating a listing), we may ask you to provide additional information, which may include your address, phone number, and a profile picture.
- **Identity Verification Information.** To help create and maintain a trusted environment, we may collect identity verification information (such as images of your government issued ID, passport, national ID card, or driving license, as permitted by applicable laws) or other authentication information.
- **Payment Information.** To use certain features of the Site (such as booking or creating a listing), we may require you to provide certain financial information (like your bank account or credit card information) in order to facilitate the processing of payments.
- **Communications with Spotery and other Members.** When you communicate with Spotery or use the Site to communicate with other Members, we collect information about your communication and any information you choose to provide.

- **Geolocation Information.** For certain features of the Site, we may capture geolocation information about your approximate location as determined by your mobile device's GPS to provide you with an enhanced user experience. Most mobile devices allow you to control or disable the use of location services for apps in the device's settings menu. We do not store geolocation data, as it is only necessary to activate certain functionalities at the time of use.
- **Usage Information.** We collect information about your interactions with the site such as the pages or content you view, your searches for Listings, bookings you have made, and other actions on the Site.
- **Log Data and Device Information.** We automatically collect log data and device information when you access and use the Site, even if you have not created a Spotery Account or logged in. That information includes, among other things: details about how you've used the Site (including if you clicked on links to third party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you've viewed or engaged with before or after using the Site.
- **Cookies and Similar Technologies.** We use cookies and other similar technologies when you use our platform, or engage with our online ads or email communications. We may collect certain information by automated means using technologies such as cookies, web beacons, pixels, browser analysis tools, server logs, and mobile identifiers. In many cases, the information we collect using cookies and other tools is only used in a non-identifiable without reference to personal information. For example, we may use information we collect to better understand website traffic patterns and to optimize our website experience.
- **Pixels and SDKs.** Third parties, including Facebook or Google, may use cookies, web beacons, and other storage technologies to collect or receive information from our websites and elsewhere on the internet and use that information to provide measurement services and target ads, but only if social login was used to authentication. For apps, that third parties, including Facebook or Google, may collect or receive information from your app and other apps and use that information to provide measurement services and targeted ads. Users can opt-out of the collection and use of information for ad targeting by updating their Facebook or Google account ad settings.
- **Total Fee Payment Transactions.** We collect information related to your payment transactions through the Site, including the payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, email address, IBAN information, your address and other related transaction details. This information is necessary for the adequate performance of the contract between you and Spotery.

2. Information Collected from you from third parties

- **Third Party Services.** If you link, connect, or login to your Spotery Account with a third party service (e.g. Google, Facebook), the third party service may send us information such as your profile information (name, last name and email). This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.

- **Background Information.** To the extent permitted by applicable laws, Spotery may obtain reports from public records of criminal convictions or sex offender registrations.
- **Referrals.** If you are invited to Spotery, the person who invited you may submit personal information about you, such as your email address or other contact information.
- **Other Sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or information to help detect fraud and safety issues, from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results (with your consent where required) or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the site through partnerships, or about your experiences and interactions from our partner ad networks.

III. Use and Sharing of Information Collected

We may use, store, and process personal information to (1) provide, understand, improve, and develop the Site, (2) create and maintain a trusted and safer environment (such as to comply with our legal obligations and ensure compliance with our policies) and (3) provide, personalize, measure, and improve our advertising and marketing.

We process this personal information for these purposes given our legitimate interest in improving and protecting the Site and our Members' experience with it, and where it is necessary for the adequate performance of the contract with you and to comply with applicable laws. We will also process your personal information for the purposes listed in this section, given our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest.

We may share your personal information for one or more of the following reasons:

- **Social media**

Where permissible, according to applicable law and where our contract with venues allows it, we may use certain limited personal information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, to generate leads, drive traffic to our websites or otherwise promote our products and services or the Site. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest.

The social media platforms with which we may share your personal information are not controlled or supervised by Spotery. Therefore, any questions regarding how your social media platform service provider processes your personal information should be directed to such provider.

- **Compliance with Law and Government Requirements**

Spotery may disclose your information, including personal information, to courts, law enforcement, governmental authorities, tax authorities, or authorized third parties, if and to the

extent we are required or permitted to do so by law or if such disclosure is reasonably necessary: (i) to comply with our legal obligations, (ii) to comply with a valid legal request or to respond to claims asserted against Spotery or its affiliated parties, (iii) to respond to a valid legal request relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability, (iv) to enforce and administer our Terms of Service or other policies and agreements with Members, or (v) to protect the rights, property or personal safety of Spotery, its employees, its Members, or members of the public.

Where appropriate, we may notify Members about legal requests unless: (i) providing notice is prohibited by the legal process itself, by a court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon Spotery's property, its Members and the Site. In instances where we comply with legal requests without notice for these reasons, we may attempt to notify that Member about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

In jurisdictions where Spotery facilitates or requires a registration, notification, permit, or license application of a Facility Owner or Service Provider with a local governmental authority through the Site in accordance with local law, we may share information of participating Facility Owners or Service Provider with the relevant authority, both during the application process and, if applicable, periodically thereafter.

In jurisdictions where Spotery facilitates the Collection and Remittance of Occupancy Taxes where legally permissible according to applicable law, expressly grant us permission, without further notice, to disclose Members' data and other information relating to them or to their transactions, bookings, Accommodations and Occupancy Taxes to the relevant tax authority.

- **Service Providers**

Spotery uses a variety of third-party service providers to help us provide services related to the Site and the Services. Spotery will require compliance with the laws from said third parties. But you as a user must understand that Spotery is not responsible for the privacy practices of any third-party service provider, nor for their acts or omissions.

IV. Security

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, and information access controls. If you know or have reason to believe that your Spotery Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Spotery Account, please contact us following the instructions in the Contact Us section below.

V. Severability

All personal information collected will be secured in accordance with the policies in force at the time of its collection. If any of these conditions is considered invalid, void or for any reason unenforceable, that condition will be considered severable and will not affect the validity and enforceability of any remaining conditions.

VI. Modifying or deleting your personal information

If you wish to modify your personal information, or if you wish to discontinue receiving materials from us or wish to remove your personal information from Spotery's database, you can contact us at support@spotery.com. Please allow up to 72 hours to process your request.

VII. Personal data retention

We retain personal data only for as long as is needed to exercise our legal obligations and for appropriate business purposes.

If you contacted us to delete your data, Spotery may retain limited aggregate information for research purposes and to help us further improve our services and exercise our legal obligations.

This aggregate information does not include any personal data that relates to you as an individual.

VIII. Changes to the Privacy Policy

In the future, we may modify our Privacy Policy. In case of changes, we will make sure to publish them on the Site and in other places that we consider appropriate and notify users if required.

CONTINUING USING THE SITE AFTER PUBLICATIONS REGARDING CHANGES OR MODIFICATIONS TO THE PRIVACY POLICY CONSTITUTES AN ACCEPTANCE BY THE USER OF SUCH CHANGES OR MODIFICATIONS. IF USER DISAGREES WITH THE CHANGES OR MODIFICATIONS, THE USER MUST IMMEDIATELY WITHDRAW FROM THE USE OF THE SITE.

IX. Questions

If you have any questions regarding our Privacy Policy, email us at info@spotery.com.