

Privacy Policy

Last updated: 4 February 2020

Please read this policy to learn about our privacy practices.

What This Privacy Policy ("Policy") Covers

- This Policy explains the privacy practices of Perfectstay Travel Ltd (the "Company") and applies to your use of the website www.perfectescapes.com and related travel booking services (collectively, the "Services");
- This Policy covers how the Company treats the personal information we collect and receive related to your use of our Services. It also explains the rights you have in respect of the Company's use of your personal information;
- This Policy does not apply to the practices of people or companies that the Company does not own, control, employ or manage, except where incorporated by reference within licensing or contractual arrangements with third parties; and
- **Minors** – You must be at least 18 years old to use or book the Services because such Services are available only to individuals who can form legally binding contracts under applicable law. The Company does not knowingly collect or use any information relating to individuals under 18 years old.

When and how we collect your personal information

- The Company collects personal information about you when you:
 - Visit and use the website;
 - Purchase products or services from the Company;
 - Send or receive email communications to or from the Company;
 - Visit the websites of or make bookings through the Company's partners;
 - Voluntarily provide us personal information by phone, email, live chats, message boards, in letters, online forms and other correspondence;
 - Participate in a member review through the Services;
 - Are referred deals by a user of the site; and

- Enter promotions or sweepstakes sponsored by or in connection with the Company.

Personal information that we collect through our services

- When you use our Services, we collect the following personal information from you:
 - Contact information such as name, email address, mailing address (including postcode, country of residence, and telephone or mobile number, username and password);
 - Billing information such as credit card information and billing address;
 - Demographic information such as your date of birth and gender;
 - Information concerning your personal preferences, such as preferred travel deals and airport, and other personal interests;
 - Information about your transactions with us and our business partners through your use of our Services, such as the travel, entertainment and other deals you access and book and with whom;
 - Information about your browser and your device such as your IP address. The Company receives IP addresses from all users because this information is automatically reported by your browser each time you view a web page.
 - Calls to and from our customer service help desk may be recorded or monitored for the purpose of quality control and for staff training. Any personal information obtained from you during the call will be treated in accordance with the provisions of this privacy policy.

Personal information that we obtain from Third Party Sources

- We may collect information through the use of third-party web analytics services (such as Google Analytics) to provide information such as the number of visits to a particular page or the amount of time spent on a website.
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- We may use information from you and third-party sites to show you relevant advertising on third party sites (e.g. Facebook, Google, Instagram, Snapchat, LinkedIn, and Twitter). This could involve showing you an advertising message on social media. If you don't want to be shown targeted advertising messages from the Company, third

party sites may allow you to request not to see messages from specific advertisers on that site in the future. In addition, social media providers, such as Facebook, may send us information about you in line with their policies. If you wish to prevent that sharing, you can do so by editing your Facebook privacy settings or the relevant settings/preferences for other social media providers.

- We may obtain information about you from other sources. For example, we may hire a third-party data aggregator to provide us additional information about our existing consumers, such as purchase history and demographic information, to provide more effective personalisation.

How we use your personal information

- We use personal information held about you in the following ways:
 - To provide you with the products or services you have requested from us or through our Services;
 - To customise the content and provide targeted advertising for our Services and to improve our Services; and
 - To conduct research and provide anonymous reporting for internal and external clients.
- We use IP addresses for various purposes, including to:
 - Diagnose service or technology problems reported by our users or engineers that are associated with the IP addresses controlled by a specific web company or ISP;
 - Send the most appropriate advertising based on geographic area or information derived from your IP address. Many IP addresses are commonly associated with Internet service providers, universities, or major corporations in specific regions or localities. Aggregate information derived from IP addresses may also be reported to advertisers or other third parties;
 - Estimate the total number of users visiting the Company from specific countries or regions of the world;
 - Assist third party advertisers to track the effectiveness of the promotions they run on our website, such as to track visits to and business on the advertised websites; and
 - Maintain the security of our Services.
- In addition, we also use your personal information for the following purposes:

- To enhance information about you with appropriate and legal data that may be obtained to serve you better, and present you with more relevant information, for example by using Geo-IP maps;

Legal basis for processing

If you are a visitor from the European Economic Area, our legal basis for collecting and using your personal data will depend on the personal data concerned and the specific context in which we collect it.

However, we will normally collect personal data from you only where: (a) we have your consent to do so, (b) where we need the personal data to perform a contract with you (e.g. to provide you with the services you have subscribed to or purchased), or (c) where the processing is in our or a third party's legitimate interests (and not overridden by your data protection interests or fundamental rights and freedoms). In some cases, we may also have a legal obligation to collect personal data from you or may otherwise need the personal data to protect your vital interests or those of another person (though this is less common).

If you have any questions about the legal basis on which we collect and use your personal data, please contact us using the contact information further below.

When we share and disclose information

- The Company does not rent or sell personal information about you to third parties, however, we reserve the right to share the personal information we collect about you through our Services with third parties when we have your permission or under the following circumstances:
 - If you are making a purchase through our services, we often work with third parties and trusted business partners to securely collect your credit card, billing address and other verifying information. Our third-party partners are required to follow generally accepted industry standards to protect the personal information they receive and/or process on our behalf. While we strive to use commercially acceptable means to protect your personal information, no method of transmission over the Internet, or method of electronic storage, is 100% secure and thus we cannot guarantee its absolute security;
 - When you use our website to make a travel booking or to take advantage of any of our other products and services, we may share your personal information with the hotel, merchant, tour operator or other involved third parties to provide you with services, or require that you transact directly with a third party partner. Additionally, we may partner with other companies to provide inventory as part

of our booking service. A partner consists of a third-party company with which we have contracted in order to provide you with our Services featured on our website. Should we partner with a company to provide you a booking, we may share your personal information with that third-party partner. Please refer to the website of the third party you are booking with for its privacy policy;

- We may provide data to trusted partners who work on our behalf to communicate with you about offers from the Company and our marketing partners, or to provide you with our location-based services. Note, these companies do not have any right to use or share your personal data for any other purposes, however they may use aggregate data for statistical purposes;
 - We may also provide data to our third-party analytics partners, such as Google Analytics, for the purposes of tracking usage information. We will share your personal information only as necessary for the third party to provide that service. To opt-out of Google Analytics use of your information, please visit: tools.google.com/dlpage/gaoptout
 - We may contract with third parties to analyse our customer data and/or handle web chat, email, customer services and other services. These third parties may monitor or record telephone calls on our behalf for quality assurance and training purposes. The companies we employ to help us with these tasks may have access to personal data to perform their functions, but are not permitted to use it for any other purposes;
 - If you purchase certain services for others, we will collect the personal information of the recipients of these services. You must make sure that you have the right to provide such personal information. When you provide any personal information for another person, you represent must make sure that they agree to the provision of their information to us for us to collect, use and disclose such personal information as set forth in this Privacy Policy. If an individual whose personal information you have provided us wishes to request the removal of their personal information, they can contact us via the details at the end of this Policy; and
 - In order to provide our users a seamless experience, some pages on our websites may be hosted by unrelated third parties. The governing privacy policy will be present on those hosted pages.
- In addition, we may share your personal information with law enforcement, regulatory authorities, courts with competent jurisdictions, emergency services or other necessary third parties for legal, protection, security, and safety purposes, including:
 - to comply with legal requirements, orders, or proceedings;
 - to comply with laws or regulatory requirements and to respond to lawful requests and legal process;

- to perform credit checks, report or collect debts owed;
- to protect the rights and property of the Company, our agents, partners, customers, and others, including enforcing our agreements, policies, and terms of use and protecting our network and physical assets; and/or
- to protect the safety of our employees and agents, our customers, or any person.
- Finally, we may transfer, share, or disclose your personal information to third parties as part of any corporate reorganization process such as a merger, acquisition, and/or a sale of all, substantially all, or part of our assets, and/or a licensing agreement with third parties. The Company will provide you with notice before your personal information becomes subject to a different privacy policy unless the privacy policy remains tied to the Company's own practices.

Confidentiality and security of your personal information

- The Company takes industry-standard technical and organisational security measures to protect your user information under our company's control against loss, misuse, or alteration. When you enter a credit card number on our website, we encrypt the transmission of that information using secure technologies.
- The Company's website include links to other websites owned or operated by third parties whose privacy practices may differ from those of the Company and are also likely to use cookies. For example, our website can contain links to and from third party websites of advertisers, hotels, tour operators and partner merchants. If you follow a link to any of these websites, please note that these websites have their own privacy policies and the information you submit is governed by their privacy policy. We do not accept any responsibility or liability for the privacy practices of such thirdparty websites and your use of such websites is at your own risk. We encourage you to carefully read the privacy policy of any website you visit.

Storage

We may store information the Company collects on servers outside your home country. However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy and have implemented the European Commission's Standard Contractual Clauses.

Data retention

- We will hold your personal information on our systems for as long as is necessary for the relevant activity or as long as is set out in any relevant contract you hold with the Company.
- We may retain certain information associated with your account in our archives, including for analytical purposes as well as for recordkeeping integrity. The periods for which we retain your information depend on the purpose for which we collected it and we use it.
- We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).
- When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If you request termination of your Company account, it is our practice to deactivate your account and block further email deliveries to you in approximately ten business days.

Your data protection rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below. (We may require you to prove your identity with approved forms of identification).
- In addition, if you are a resident of the European Union, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below.

- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.
- We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Changes to our Privacy Policy

- The Company may update this Policy from time to time so you may wish to check it each time you submit personal information to the Company. We will post any update(s) to this Policy on our websites. All update(s) will be effective immediately on posting. The date on which this Policy was last updated is shown at the top of the Policy. If you do not agree to these changes, please do not continue to use the website or services to submit personal information to the Company.
- If we make any material changes in the way we treat personal information, we will notify you by including a notice in an email sent to the primary email address you provided to us or by placing a prominent notice on our Privacy Policy web pages and/or our home page.

How to contact us

- If you have questions about this Privacy Policy, regarding disclosure of personal information to third parties should it ever occur, or about data we may hold about you, please email us at dpo@perfectstay.com or perfectescapes@service.perfectstay.com or write to us at:

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