

## Vacayz, Inc. Privacy Policy

This Privacy Policy describes how Vacayz, Inc. (“we,” “us,” or “Vacayz”), processes personal information that we collect through the Vacayz Platform (the “Platform”).

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### 1. Definitions

Undefined terms in this Privacy Policy have the same definition as in our Terms of Service (“Terms”).

### 2. Personal Information We Collect

#### 2.1 Information needed to use the Platform.

We collect personal information about you when you use the Platform. Without it, we may not be able to provide you with all services requested. This information includes:

- **Guest:**
  - Contact Information, Account, Profile Information, including but limited to your first name, last name, company name, phone number, postal address, email address, date of birth.
  - Identity Verification and Payment Information, including but limited to images of your government issued ID (as permitted by applicable laws), your ID number or other verification information, credit card, bank account or payment account information.
- **Host:**

- Contact Information, Account, Profile Information, including but limited to your business information, company name, phone number, postal address, email address, property descriptions, Option terms information, your services, terms and policies, photos, and videos.
- Identity Verification and Payment Information, including but limited to images of your government issued licenses and certifications, your EIN number or other verification information, credit card, bank account or payment account information.

## 2.2 Information Automatically Collected by Using the Platform.

When you use the Platform, we automatically collect personal information. This information may include:

- **Geo-location Information.** Such as precise or approximate location determined from your IP address or mobile device's GPS depending on your device settings. We may also collect this information when you're not using the Platform if you enable this through your settings or device permissions.
- **Usage Information.** Such as the pages or content you view, searches for Options you have made, and other actions on the Platform.
- **Log Data and Device Information.** Such as details about how you've used the Platform (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 Platform. We may collect this information even if you haven't created an account or logged in.
- **Cookies and Similar Technologies.** Such as cookies, mobile identifiers, tracking URLs, log data and similar technologies, used to help provide, protect, and improve the Platform.
- **Payment Transaction Information.** Such as payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, PayPal email address, IBAN information, your address and other related transaction details.

## 2.3 Personal Information We Collect from Third Parties.

We collect personal information from other sources, such as:

- **Third-Party Services.** If you link, connect, or login to the Platform with a third party service (e.g. Google, Facebook) you direct the service to send us information such as your registration, and profile information as 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, we may obtain reports from public records of criminal convictions or sex offender registrations. We may use your information, including your full name and date of birth, to obtain such reports.
- **Referrals and co-Guests.** If you are invited to the Platform such as a co-Guest, the person who invited you can 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 references, 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 or fraud warnings from identity verification service providers for use in our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the Platform, or about your experiences and interactions from our partners.

### 3. How We Use Information We Collect

**3.1 Provide, Improve, and Develop the Platform.** We use personal information to:

- Enable you to access the Platform and make and receive payments.
- Enable you to communicate with other members.
- Perform analytics, debug and conduct research.
- Provide customer service.
- Send you messages, updates, security alerts, and account notifications.
- Personalize and customize your experience based on your interactions with the Platform, your search and Option offering or purchase history, your profile information and preferences, and other content you submit.
- Enable your use of our Option Marketplace products.

**3.2 Create and Maintain a Trusted and Safer Environment.** We use personal information to:

- Detect and prevent fraud, spam, abuse, security and safety incidents, and other harmful activity.
- Study and combat discrimination.
- Conduct security investigations and risk assessments.
- Verify or authenticate information provided by you.
- Conduct checks against databases and other information sources, including background or police checks.
- Comply with our legal obligations, protect the health and well-being of our Guests, Hosts, and members of the public.
- Resolve disputes with our members.
- Enforce our agreements with third parties.

- Comply with law, respond to legal requests, prevent harm and protect our rights (see Section 4.4).
- Enforce our Terms and other policies.
- In connection with the activities above, we may conduct profiling based on your interactions with the Platform, your profile information and other content you submit to us, and information obtained from third parties. In limited cases, automated processes could restrict or suspend access to the Platform if such processes detect activity that we think poses a safety or other risk to us, our community, or third parties. If you would like to challenge the decision based on the automated process, please contact us via the Contact Information section below.

### **3.3 Provide, Personalize, Measure, and Improve our Advertising and Marketing.** We may use personal information to:

- Send you promotional messages, marketing, advertising, and other information based on your preferences and social media advertising through social media platforms.
- Personalize, measure, and improve our advertising.
- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by us or our third-party partners.
- Analyze characteristics and preferences to send you promotional messages, marketing, advertising and other information that we think might be of interest to you.
- Invite you to events and relevant opportunities.

### **3.4 Provide Payment services.** Personal information is used to enable or authorize third parties to use payment services:

- Detect and prevent money laundering, fraud, abuse, or security incidents.
- Conduct security investigations and risk assessments.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce the payment terms and other payment policies.
- Provide and improve the payment services.

## **4. Sharing and Disclosure**

### **4.1 Sharing With Your Consent or at Your Direction.**

Where you provide consent, we share your information as described at the time of consent, such as when authorizing a third-party application or website to access your account or participating in promotional activities by our partners or third parties.

Where permissible with applicable law, we may use certain information about you, such as your email address, de-identify it, and share it with social media platforms, to generate leads, drive traffic to us or otherwise promote our products and services.

#### **4.2 Sharing Between Members.**

To help facilitate Option transactions and/or exchange or other interactions between members, we may need to share certain information such as:

- When an Option Purchase is made, certain information may be shared between Guest(s) and Host(s), including profile, name, names of any additional Guests, cancellation history, review information, and other information you submit. When an Option Purchase is confirmed, additional information is shared to assist with completing the transaction and facilitating booking. When you as a Host have a confirmed Option sale, certain information is shared with the Guest to facilitate the exercising of the Option and booking, such as your profile, accommodation terms and policies.

#### **4.3 Information You Publish in Profiles, Options, and other Public Information.**

You can make certain information publicly visible to others, such as:

- Your public profile page.
- Option listing pages that include information such as the Option terms, your accommodation, calendar availability, photos, and additional information you choose to share.
- Reviews, ratings and other public feedback.
- Content in a community or discussion forum, blog or social media post.

We may display parts of your public profile and other Content you make available to the public like your business and accommodation details on third-party sites, platforms and apps.

Information you share publicly on the Platform may be indexed through third-party search engines.

#### **4.5 Complying with Law, Responding to Legal Requests, Preventing Harm and Protecting our Rights.**

We may disclose your information to courts, law enforcement, governmental or public authorities, tax authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or where 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 us, (iii) to respond to a valid legal

request relating to a criminal investigation to address alleged or suspected illegal activity, or to respond to or address any other activity that may expose us, you, or any other of our users to legal or regulatory liability, (iv) to enforce and administer our agreements with Hosts, or (v) to protect the rights, property or personal safety of Vacayz, its employees, its members, or members of the public. For example, if permitted due to the forgoing circumstances, Host tax information may be shared with tax authorities or other governmental agencies.

Where appropriate, we may notify you about legal requests unless: (i) providing notice is prohibited by the legal process itself, by 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 or harm to us, our members, or expose us to a claim of obstruction of justice.

For jurisdictions where Vacayz facilitates the collection and remittance of Taxes where legally permissible according to applicable law, we may disclose Hosts' and Guests' information about transactions, bookings, Accommodations and occupancy Taxes to the applicable tax authority.

#### **4.5 Service Providers.**

We share personal information with affiliated and unaffiliated service providers to help us run our business, including service providers that help us: (i) verify your identity or authenticate your identification documents, (ii) check information against public databases, (iii) conduct background or police checks, fraud prevention, and risk assessment, (iv) perform product development, maintenance and debugging, (v) allow the provision of our Services through third-party platforms and software tools, (vi) provide customer service, advertising, or payments services, or (vii) process, handle or assess insurance claims or similar claims. These providers are contractually bound to protect your personal information and have access to your personal information to perform these tasks.

#### **4.6 Business Transfers.**

If Vacayz undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred and becomes subject to a different privacy policy.

## **5. Other Important Information**

### **5.1 Analyzing your Communications.**

We may review, scan, or analyze your communications on the Platform for reasons outlined in Section 3 of this policy (How We Use Information We Collect), including fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, analytics, enforcing our Terms of Service, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyze messages to mask contact information and references to other sites. In some cases, we may also scan, review, or analyze messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible. Occasionally we may need to manually review communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools.

## **5.2 Third-Party Partners & Integrations.**

Parts of the Platform may link to third-party services, not owned or controlled by Vacayz. Use of these services is subject to the privacy policies of those providers. Vacayz does not own or control these third parties and when you interact with them you are providing your information to them.

## **6. Your Rights**

You can exercise any of the rights described in this Section consistent with applicable law.

### **6.1 Managing Your Information.**

You can access and update some of your personal and business information through your account settings. You are responsible for keeping your personal information up to date.

### **6.2 Data Access and Portability.**

In some jurisdictions, applicable law may entitle you to request certain copies of your personal information or information about how we handle your personal information, request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format, and/or request that we transmit this information to another service provider (where technically feasible).

### **6.3 Data Erasure.**

In certain jurisdictions, you can request that your personal information be deleted. Please note that if you request the erasure of your personal information:

- We may retain your personal information as necessary for our legitimate business interests, such as prevention of money laundering, fraud detection and prevention, and enhancing safety.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations.
- Information you have shared with others will continue to be publicly visible on Vacayz, even after your account is cancelled. However, attribution of such information to you will be removed. Some copies of your information will remain in our database, but are disassociated from personal identifiers.
- Because we take measures to protect data from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

## 7. Security

While no organization can guarantee perfect 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.

## 8. Changes To This Privacy Policy

We reserve the right to modify this Privacy Policy at any time in accordance with applicable law. If we do so, we will post the revised Privacy Policy and update the “Last Updated” date at the bottom. In case of material changes, we will also provide you with notice of the modification by email at least thirty (30) days before the effective date. If you disagree with the revised Privacy Policy, you can cancel your Account. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of the Platform will be subject to the revised Privacy Policy.

## 9. Contact Information

For questions or complaints about this Privacy Policy or Vacayz’s handling of personal or business information please contact us via the Contact Us page.

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