

pyrateCrew Privacy Policy

Effective date: July 1, 2023

pyrateCrew is an online travel company that helps people around the world find and book short term multi-tenant housing. Our website and related application (collectively, our “Service”) are owned and operated by pyrateCrew Inc. We understand that providing information online involves a great deal of trust on your part. We take this trust very seriously, and make it a high priority to ensure the security and confidentiality of the personal information you provide to us when you use our Service. Please read this Policy carefully to learn about our privacy practices. By using our Service on a mobile phone, tablet, personal computer or similar device (a “Device”) or in connection with other sites or services, you are accepting the practices described herein.

Overview

This Privacy Policy describes in detail our policy and practices regarding our collection, use and disclosure of your personal data.

We understand that providing information online involves a great deal of trust on your part. We take this trust very seriously, and make it a high priority to ensure the security and confidentiality of the personal data you provide us when you visit our Website or use our services.

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1. Collection of Personal Information

Personal information is any information used or intended to be used to identify a particular individual, which includes name, address, telephone number, email address. We collect several types of information from and about users of the Service, including:

- Personal information and other information you provide to us when you register for or use the Service including to transact with us, or subscribe to content we offer. For example, we may collect information such as your first and last name, address (including

street name and name of a city or town), email address, telephone number, and other identifiers that permit physical or online contact.

- Automatically collected information from your devices in connection with your online activity (including, in some cases, specific location information or information that enables us to identify you across devices).
- Information you provide outside this application to other companies (such as a credit card payment) that you associate with your pyrateCrew account.
- Information included in any messaging you undertake through the Service, such as sharing of trip-related information.
- If you contact us, the information you provide to us that details the nature of your question or problem, and any other information you provide.

2. Information Sharing

You will have the opportunity to provide contact and travel-related information for other people through our Service. By providing the information you are consenting the Service to share the information with other users.

- Telephone numbers, email address and postal address are not shared by the Service with other users.
- pyrateCrew does not take responsibility for any personal information you make through a direct message or a website post through the Service or a third party application related to the Service.

3. How we use personal data

We may use the information we gather to operate pyrateCrew and when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To provide and improve the Service and its contents for you and others;
- To provide you with information, products or services that you request or otherwise elect to receive from us or from one of our strategic partners;
- To notify you about changes to the Service or important information regarding pyrateCrew;
- To allow you to utilize the trip integration, sharing, and messaging features of the Service;
- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;

- Where we need to comply with a legal or regulatory obligation;
- To allow you to view another of another user of the Service (with their consent);
- To send or receive a message from another user of the Service; and
- To provide you with email or other messaging regarding additional products or services you may be interested in, either from us or from one of our strategic partners, including promotional emails or messages.

Each time you receive a marketing message, you will be able to tell us if you no longer wish to receive them, or deny push notifications from the Service, or change the settings of your mobile device to do so for that type of marketing message or notification. You will be able to unsubscribe from each of those marketing communications at any time by clicking on the unsubscribe link that you will find at the bottom of each communication you receive from us.

Please note that we may continue to send you service communications, such as service and administrative messages about your account or transactional messages related to one of your bookings. It is not possible to unsubscribe from these service communications.

4. With whom we share your data

prateCrew may share your information with other parties, including:

- Third-party service providers who provide services or functions on our behalf, including business analytics, payment processing, customer service, marketing, public relations, distribution of surveys or sweepstakes programs, and fraud prevention. We may also authorise third-party service providers to collect information on our behalf, including, for example, as necessary to operate features of our Service or to facilitate the delivery of online advertising tailored to your interests. Third-party service providers have access to and may collect information only as needed to perform their functions and are not permitted to share or use the information for any other purpose.
- Business partners with whom we may offer products or services in conjunction. You can tell when a third party is involved in a product or service you have requested because their name will appear either with ours or separately. If you choose to access these optional services, we may share information about you, including your personal data, with those partners. Please note that we do not control the privacy practices of these third-party business partners.
- Affiliated Websites. If you were referred to pyrateCrew from another service, we may share your registration information, such as your name, email address, mailing address, telephone number and travel preferences with that referring service. We encourage you to review the privacy policies of any company that referred you to pyrateCrew.

We also may share your information if we believe, in our sole discretion, that such disclosure is necessary:

- to comply with legitimate and enforceable subpoenas, court orders or other legal process; to establish or exercise our legal rights; to defend against legal claims or as

otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us;

- to investigate, prevent or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property or safety of TripAdvisor, our customers or others and in connection with our Terms of Use and other agreements or
- in connection with a corporate transaction, such as a divestiture, merger, consolidation or asset sale or in the unlikely event of bankruptcy.

Other than as set out above, you will be notified when personal data about you will be shared with third parties, and you will have an opportunity to choose not to have us share such information.

We may also share aggregate or anonymous information with third parties, including advertisers and investors. For example, we may tell our advertisers the number of visitors our Service receives or the most popular activities and destinations. This information does not contain any personal data and is used to develop content and services we hope you will find of interest.

5. Your Personal Information

You may access, correct or delete your contact information and preferences through your pyrateCrew account. For other personal information, when pyrateCrew is the controller of the data and receives it directly from you, we make good faith efforts to provide you with access so you can request that we correct the data if it is inaccurate or delete the data if pyrateCrew is not required to retain it by law. We may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are impractical, or for which access is not otherwise required by local law.

In accordance with applicable law, you may have the following rights with regard to your personal data:

- The right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- The right to request to correct your personal data if it is inaccurate. You may also supplement any incomplete personal data we have, taking into account the purposes of the processing.
- The right to request deletion of your personal data if:
 - your personal data is no longer necessary for the purposes for which we collected or processed them; or
 - you withdraw your consent if the processing of your personal data is based on consent and no other legal ground exists; or
 - you object to the processing of your personal data and we do not have an overriding legitimate ground for processing; or

- your personal data is unlawfully processed; or
 - your personal data has to be deleted for compliance with a legal obligation.
- The right to object to the processing of your personal data. We will comply with your request, unless we have a compelling overriding legitimate interest for processing or we need to continue processing your personal data to establish, exercise or defend a legal claim.
- The right to restrict the processing of personal data, if:
 - the accuracy of your personal data is contested by you, for the period in which we have to verify the accuracy of the personal data; or
 - the processing is unlawful and you oppose the deletion of your personal data and request restriction; or
 - we no longer need your personal data for the purposes of processing, but your personal data is required by you for legal claims; or
 - you have objected to the processing, for the period in which we have to verify overriding legitimate grounds.
- The right to data portability. You may request us to receive the personal data that concern you. You may also request us to send this personal data to a third party, where feasible. You only have this right if it regards personal data you have provided us, the processing is based on consent or necessary for the performance of a contract between you and us, and the processing is done by automated means.

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting or statutory reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

We may retain certain information subsequent to the closing of your account, for example if it is necessary to successfully complete a trip from another user, to fulfill our legal obligations or to exercise, to maintain security, to prevent fraud and abuse and to defend or enforce our rights. If you choose to close your account, your personal data will generally stop being visible to others on our Service within 30 days.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights described in this Privacy Policy). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to

receive it. In an effort to speed up our response, we may also contact you to ask you for further information in relation to your request.

6. Cookies and other web technologies

When you use the Service, some information such as Internet protocol (IP) address, device or browser information, logs, or click-stream information is automatically collected about your usage and activity to address technical support issues and understand how you use the Service. pyrateCrew may use certain tracking technologies such as cookies, web beacons, or third-party analytics tools to obtain such information. The Service may utilize tracking technologies from third-party service providers we have engaged to provide services on our behalf. In some cases, these are analytics providers that provide services such as application analytics and crash reporting. In other cases, these are advertising or campaign measurement providers. These providers may also automatically collect some of the information described above, including, for example, usage information, IP address, access times, browser type and language, device type, device identifiers, and Wi-Fi information. These providers may also automatically collect the above information about you through the Service and on other sites and services, including personally identifiable information about your online activities over time and across different websites, devices, online services, and applications when you use our Service.

7. How we protect your personal data

We want you to feel confident about using pyrateCrew, and we are committed to protecting the personal data we collect. While no website can guarantee perfect security, we have implemented and maintain appropriate physical, administrative, technical, and organizational measures to protect the personal data you provide us against unauthorized or unlawful access, use of disclosure and against accidental loss, damage, alteration or destruction.

8. Information concerning minors

pyrateCrew is a general audience site and does not offer services directed to minors. We do not knowingly collect data relating to minors. If a person whom we know is under 13 years of age sends us personal data, we will delete or destroy this information as soon as reasonably possible.

9. External links

Our Service may include links to third party websites, plug-ins and applications. If you access other websites from the links provided through our Service, the operators of those websites may collect or share information about you. This information will be used by them in accordance with their privacy policy. We do not control these third-party websites and recommend that you examine the privacy statements posted on those other websites to understand their procedures for collecting, using and disclosing personal data.

10. International transfers

pyrateCrew operates in the United States. Using the Service may result in the transfer, use, processing, or storage of Personal Data in the United States including jurisdictions that may not have data privacy laws that provide protections equivalent to those provided in your home country. pyrateCrew intent is to provide the safeguards required by the laws of your home country.

By providing your information to us through your use of the Service, you agree to that transfer, storage, and processing of your Personal Data in the United States.

11. Updates to this Privacy Policy

We may update this Policy from time to time without notice to you other than posting the revised policy on the pyrateCrew website or by providing such notice about or obtaining consent to changes as may be required by applicable law. If we change our Privacy Policy, we will post those changes to this Privacy Policy and change the "last revised" date above. We encourage you to periodically review this page for the latest information on our privacy practices.

12. How you can contact us

You may contact us by sending an email to privacy@pyratecrew.com.