

POLICY

REGARDING THE PROCESSING OF PERSONAL DATA

Your privacy is one of our fundamental commitments, and therefore, we take utmost care to process your personal data in accordance with the principles set forth in the applicable legislation.

TRAVLOCALS PROMO S.R.L., having its headquarters at 15 General Marin Ionescu street, 2nd room, Pitești, Argeș, tax code 40956886, registered with the Trade Registry under no. J03/1121/2019 ("**Travlocals**", "**Company**" "**us**") processes, as data controller, your personal data („**Personal Data**"). The purpose of this privacy policy („**Privacy policy**") is to explain how your Personal Data is processed by Travlocals when using the Travlocals platform available at the URL address www.travlocals.com (the "**Platform**")

The capitalized terms that are not defined in this Privacy policy will have the meaning set forth in the Terms and Conditions of the Platform that can be accessed [here](#) (the „**Terms**").

1. CATEGORIES OF PERSONAL DATA, PROCESSING PURPOSES AND LEGAL GROUNDS

A. SITUATIONS APPLICABLE TO HOSTS

a. Processing a request of a Host for enrolment in the Platform

Processed Personal Data: first name, last name, e-mail address, phone number.

Processing purpose	Legal ground
Verification of the Hosts by Travlocals for acceptance or refusal of listing as Host on the Platform.	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR).

b. Creating the User Account for Hosts

Processed Personal Data: **username**, first name, last name, e-mail address, data included in the identity card, image, bank account.

Processing purpose	Legal ground
Creating the User Account.	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR).

c. Creating the Host Page

In our Platform, each Host will present their services through a dedicated web page. Certain Hosts' Personal Data (first name, last name, image) will be included on this page. This information will be publicly accessible in our Platform.

We may also, from time to time, make different checks to ensure that you only own one Host Page on the Platform, in accordance with the Terms. In this case we will be able to use the email addresses, phone numbers and IP addresses.

Processing purpose	Legal ground
Creating a Host Page and displaying Host Accommodation and/or Experience services on our Platform.	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR).
Verify that a Host complies with the obligation of not having multiple Host Pages.	<p>Legitimate interest of the company (art. 6, para. 1, let. f of GDPR)</p> <p>Details: the legitimate interest of the Company to create a secure and reliable, transparent Platform regarding the services provided by the Hosts.</p>

d. Issuing the invoices

If the Host is a natural person, the following Personal Data will be processed: first name, last name, domicile, or PIN (personal identification number), payment amount, e-mail address.

If the Host is a legal person, the following Personal Data of the Host's representative will be processed: first name, last name, e-mail address.

Processing purpose	Legal ground
Issuing invoices for the Services offered by the Company.	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR)</p> <p>Fulfilment of a legal obligation of the Company (art. 6, para. 1, let. c of GDPR)</p> <p>Details: complying with the tax obligations.</p>

B. SITUATIONS APPLICABLE TO CLIENTS

a. Creating the User Account for Clients

Processed Personal Data: **username**, first name, last name, phone number, e-mail address, image, bank account.

Processing purpose	Legal ground
Creating the User Account.	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR).

b. Making a reservation by the Client

Processed Personal Data: first name, last name, e-mail address, phone number, image (profile picture).

This information will be transmitted to the Host.

Processing purpose	Legal ground
Booking the services provided by a	Performance of a contract to which the data subject is

Host.	party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR).
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C. SITUATIONS APPLICABLE TO HOSTS, CLIENTS AND OTHER USERS

a. Editing/finalizing the User Account

Users have the possibility to edit the information in the Account. In this case, the edited Personal Data will be processed.

Processing purpose	Legal ground
Updating the information included in the User Account,	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR),

b. Posting a review

The Hosts and the Clients may post reviews regarding their interactions, Hosts' services, Clients' behavior. These reviews (Personal Data and information included) will publicly available on the Platform.

In this situation, the following Personal Data will be processed:

- regarding the user posting the review: first name, last name, username, image (profile picture).
- regarding the user about whom the review is: first name, last name, username, image (profile photo), any information included in the review.

Processing purpose	Legal ground
Informing other Users about the behaviour of a User (behaviour of a Client / Host, services of a Host).	<p>Legitimate interest of the company (art. 6, para. 1, let. f of GDPR)</p> <p>Details: the legitimate interest of the Company to create a secure and reliable, transparent Platform regarding the services provided by the Hosts and the behavior of the Hosts and Clients; as well as the legitimate interest of other Users in the services offered by Hosts, the behavior of Hosts and Clients.</p>

c. Client Payments and transfer of the paid amounts to Hosts

Processed Personal Data: first name, last name, payment amount, bank details.

Processing purpose	Legal ground
Collecting the payments from Clients related to a reservation and transferring the amounts to Hosts as a price for the Accommodation and/or Experience services that Clients will benefit from.	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR).</p> <p>Fulfilment of a legal obligation of the Company (art. 6, para. 1, let. C of GDPR)</p> <p>Details: operating the transfers of the money amounts and keeping the supporting documentation for accounting purposes.</p>

d. Direct communication between the Client and the Host by using the chat

In our Platform, the Users (Clients and Hosts) have the possibility to communicate with each other via our chat.

We may also, from time to time, check the chat communications to ensure that Users (in particular Hosts) comply with their obligations under the Terms (regarding their conduct, way of discuss with the Clients, prohibition of appropriation of Clients).

Processed Personal Data: first name, last name, username, image (profile picture).

Processing purpose	Legal ground
Providing a direct communication channel between Clients and Hosts for the exchange of information regarding the details of a reservation.	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR).
Verification of chat messages to ensure that Users comply with their obligations regarding communications on the Platform.	<p>Legitimate interest of the company (art. 6, para. 1, let. f of GDPR)</p> <p>Details: the legitimate interest of the Company to create a secure and reliable, transparent Platform regarding the behavior of the Hosts and Clients.</p>

e. Communication between Users and the Company

Processed Personal Data: first name, last name, e-mail address, phone number.

Processing purpose	Legal ground
Communicating with the User in connection with the requested offer or in connection with the resolution of the problem.	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR).

f. Contractual notifications

When providing our Services, we will use your e-mail address to notify you of any changes in the Terms of the Platform and in relation to any other aspects of the performance of the contract between the Company and you.

Processing purpose	Legal ground
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The purpose of this processing is to send contractual notices, in accordance with the Terms of the Platform.	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6, para. 1, let. b of GDPR).
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g. Marketing messages

Personal Data Processed: first name, last name, e-mail address.

Processing purpose	Legal ground
Sending marketing message to promote the Company and the Services.	Data subject's consent (art. 6, para. 1, let. a of GDPR).

h. Legal disputes

Processed Personal Data: first name, last name, domicile.

Processing purpose	Legal ground
Defending our legitimate rights and interests and support any claims before judicial bodies or any other public authorities.	<p>Legitimate interest of the company (art. 6, para. 1, let. f of GDPR)</p> <p>Details: the legitimate interest of the company in defending the legal rights or legitimate interests or in filing the claims arising out of or in close connection with the conclusion or performance of the contract or in order to exercise the right of defense in the event of any dispute against the company</p>

2. PROVIDING YOUR PERSONAL DATA

You may refuse to provide certain Personal Data but in such a case you may not be able to benefit from certain services specific to the relationship described in this Privacy policy.

3. LEGAL GROUNDS

The legal ground for processing the Personal Data differs depending on the specific situation and the Personal Data processed.

When we process your Personal Data based on your consent, we will seek for your free, informed, specific and unequivocal consent for the respective processing. By expressing your consent, you will agree that we may collect, use, disclose, process and transfer Personal Data in accordance with this Privacy policy.

4. AUTOMATED INDIVIDUAL DECISION-MAKING PROCESS

Your Personal Data shall not be processed in order to be subject to decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, pursuant to art. 22 para. (1) of GDPR.

5. STORAGE DURATIONS

The storage duration of Personal Data varies depending on the specific processing operation.

As a rule, we will keep Personal Data during the existence of your User Account in our Platform..

However, in the case of processing operations based on your consent (such as in the case of sending commercial messages), we will process the Personal Data until you withdraw the consent.

In certain circumstances, we may retain your Personal Data for longer periods of time in order to have an accurate record of your relationship with us in the event of any complaints or if we reasonably believe that there is a prospect of a litigation.

6. TRANSFER OF PERSONAL DATA

We may transfer Personal Data, to the necessary extent, to the following categories of recipients: IT services suppliers, marketing services suppliers, public authorities.

These recipients can be located in the European Union and/or in the European Economic Area. Where recipients are located outside the European Union and the European Economic Area, including in countries not recognized as ensuring an adequate level of protection, the transfer of Personal Data shall be carried out only if there are appropriate guarantees, in accordance with applicable law. In this respect, we rely on several guarantees, such as the standard contractual clauses issued by the European Commission. You may receive from us a list of recipients from third countries, as well as a copy of the agreed provisions that ensure an adequate level of protection of Personal Data. For any request to this effect, please contact us at the contact details mentioned below.

7. SECURITY OF PERSONAL DATA

The security of your Personal Data is important for us. Your Personal Data will therefore be processed by applying reasonable technical and organizational measures to protect Personal Data, such as limiting access to Personal Data, encryption or anonymization of Personal Data, storage on secure environments. However, despite our efforts, we cannot always guarantee the effectiveness of the security measures implemented, and therefore we cannot guarantee the security of Personal Data at any time.

8. RIGHTS IN CONNECTION WITH THE PROCESSING OF YOUR PERSONAL DATA

Access right: You have the right to obtain confirmation from us that your Personal Data is processed by us, as well as information on the specific processing, such as: the purposes of processing, categories of processed Personal Data, recipients of Personal Data, the period for which Personal Data is stored, the source of Personal Data, if we transfer the Personal Data abroad and how we protect it, your rights, the right to lodge a complaint before the supervisory authority.

Right to rectification: You have the possibility to request rectification of your Personal Data, provided that the applicable legal requirements are met. In the event of errors, after notification, we will immediately correct your Personal Data.

Right to erasure: In certain cases, you have the possibility to request the deletion of Personal Data, namely when: (i) the Personal Data is no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you withdraw consent on which the processing is based and where there is no other legal ground for the processing; (iii) the Personal Data have been unlawfully processed; (iv) you exercise the right to object to the processing. We are not obliged to comply with your request when the processing is necessary (among others) for compliance with a legal obligation or for the establishment, exercise or defence of legal claims. There are also other circumstances in which we are not obliged to comply with this request for the deletion of Personal Data.

Restriction of processing: You may request us to restrict the processing of your Personal Data in the following circumstances: (i) you contest the accuracy of the Personal Data, for a period enabling us to verify it; (ii) the processing is unlawful and then you oppose to the erasure of the Personal Data and request the restriction of their use instead; (iii) we no longer need the Personal Data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; (iv) you have objected to processing, pending the verification whether our legitimate grounds override yours. However, we can continue to process your Personal Data (i) when you consent; (ii) for the establishment, exercise or defence of legal claims or (iii) for the protection of the rights of another natural or legal person.

Right to data portability: Insofar the Personal Data is processed based on your consent or on the execution of the agreement and the processing is carried out by automated means, you have the right to have your data Personal Data provided to you in a structured format, which is currently used and can be read automatically and you have the right to request us to transfer this Personal Data to another controller. This right shall not adversely affect the rights and freedoms of others.

Right to opposition: In certain situations, such as when we process your Personal Data on the basis of a legitimate interest, you have the right to object to the processing of your Personal Data by us. In the event of unjustified objection, Travlocals is entitled to continue processing Personal Data. You also have the right to object to the processing of your Personal Data for marketing purposes.

Withdrawal of consent: Insofar you consented to the processing of your Personal Data, you can withdraw your consent at all times, without affecting the lawfulness of processing based on consent before its withdrawal.

Right not to be subject to any automatic individual decisions: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. Such right cannot be exercised when the decision: (i) is necessary for entering into, or performance of, a contract between you and us; (ii) is authorized by law which lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or (iii) is based on your explicit consent.

Right to lodge a complaint with the supervisory authority: You have the right to lodge a complaint with the supervisory authority in relation to any breach of your rights regarding the processing of your Personal Data.

To learn more about the manner in which you may exercise the aforementioned rights, please contact us at the e-mail below.

9. CONTACT

If you have any questions or concerns about this Privacy policy or its implementation, you may contact us at: support@travlocals.com.