

## DATA PROTECTION CHARTER

*Last update*

*September 29<sup>th</sup>, 2022*

In the course of its activities, the operator of the onefinestay site and service, Lifealike Limited, part of the Accor group and trading as onefinestay, located at C/O Mazars LLP The Pinnacle, 160 Midsummer Boulevard, Milton Keynes, Buckinghamshire, United Kingdom MK9 1FF, and its Affiliates (together "**onefinestay**" or "**OFS**" or "**we**") may process "Personal Data" as part of your use of the site and service. The definition of "Personal Data" and other important terms can be found in the [Glossary](#) which appears at the end of this document.

Personal Data we collect and use includes information relating to (i) persons booking accommodation we propose (hereinafter "**Guests**"), (ii) owners (and household members) of the accommodations we propose (hereinafter the "**Homeowners**"), as well as (iii) property management companies (hereinafter the "**PMC**"), as well as (iv) users (hereinafter the "**Users**") of our website and service at <https://www.onefinestay.com/> (hereinafter the "**Website**"), and (v) to our various service providers and suppliers (hereinafter the "**Partners**"). In this respect, OFS acts as the Data Controller.

Because we consider you an important customer, our first priority is to offer you exceptional stays and experiences throughout the world. Your complete satisfaction and confidence in OFS are absolutely essential to us.

In this respect, we deeply care in protecting your privacy, and that's why, as part of our commitment to meeting your expectations, we have set up this Data Protection Charter (hereinafter the "**Charter**"). This charter formalizes our commitments to you and describes how OFS collects and uses your Personal Data.

In order to provide you with information in a clear and transparent manner, the Charter has been drafted to inform you in a general way about the practices of OFS, but also to provide you with precise and tailored information, depending on whether you are a:

- Guest,
- Homeowner,
- PMC,
- User,
- Partner.

### IMPORTANT ADDITIONAL INFORMATION

OFS is based in the UK and is therefore subject to UK legislation including the Data Protection Act of 2018. However, as our business also targets data subjects located in the European Union, we must also comply with the EU General Data Protection Regulation 2016/679 of the European Parliament and of the Council of April 27<sup>th</sup>, 2016 (GDPR).

In addition to the GDPR, OFS may also be subject to local laws and regulations depending on where you live. To learn more about these specific rules, we invite you to go directly to section [15 "IF YOU LIVE OUTSIDE THE EUROPEAN UNION"](#) of this Charter.

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We recommend that you read this Charter carefully in order to understand the nature of the Personal Data that OFS collects about you and the way we use the information.

For more clarity, you will find below the summary of the Charter.

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**I. GENERAL PRINCIPLES APPLICABLE TO ALL  
OUR PERSONAL DATA PROCESSING**

## 1) TO WHOM DOES THE CHARTER APPLY?

This Charter applies to Guests, Homeowners, PMC, Users and Partners.

For your information, if you are a Guest, the accommodation that you book is not owned by OFS. The accommodations presented on the Website are in fact under an agreement concluded between the Homeowner and OFS or a PMC.

However, when you stay in one of these accommodations as a Guest, your Personal Data is not communicated to the Homeowner, nor will the Personal Data of the Homeowner be shared with you.

OFS has also communicated the principles set out in this Charter to all of its Partners. We require that our Partners as well as PMC comply with the applicable data protection laws and this Charter in relation to the processing of your Personal Data.

## 2) WHAT ARE OUR COMMITMENTS?

OFS processes all your Personal Data, according to the terms of this Charter and in compliance with the applicable laws.

More specifically, OFS has established the following 10 principles for the processing of your Personal Data:

1. **Lawfulness:** we use Personal Data only if their processing is based on one of the legal basis presented in the GDPR.
2. **Fairness:** we explain to you why we need the Personal Data we collect.
3. **Identified Purposes and Data Minimization:** we only use Personal Data that we really need. If the result can be achieved with less Personal Data, then we make sure we use the minimum Data required.
4. **Transparency:** We inform data subjects about the way we use their Personal Data.
5. We facilitate the exercise of the **data subject's rights**.
6. **Storage limitation:** we retain Personal Data for a limited period.
7. We use industry-standard measures designed to the **security** of Personal Data, i.e. its integrity and confidentiality.
8. If a **third party** uses Personal Data, we make sure it has the capacity to protect that Personal Data.
9. If Personal Data is **transferred** outside Europe, we ensure this transfer is covered by specific legal protection and tools.
10. If Personal Data is compromised (lost, stolen, damaged, unavailable...), we notify such breaches to the respective country's responsible authority and to the data subject concerned, if the **breach** is likely to cause a high-risk in respect of the rights and freedoms of this person.

For any questions concerning these ten data protection principles of OFS, please contact us directly at the email address listed in section 8 below.

## 3) WHAT PERSONAL DATA IS COLLECTED?

You will find in the table below the list of Personal Data we collect depending on whether you are a Guest, a Homeowner, a PMC, a User, or a Partner:

Category of data subjects	Personal Data collected
If you are a Guest	Your name, surname, email address, phone number, interests, dietary habits, postal address, country of residence, country of origin, date of birth, ID card, photograph (optional), credit card information (optional, and for some of our janitorial services), reservation information, browsing information (e.g. IP address), as well as any other Personal Data that you would voluntarily communicate to us.
If you are a Homeowner	Your name, surname, household composition, email address, postal address, phone number, country of residence, tax number, bank account information (e.g. RIB), sector of activity, nationality, calendar of presence and absence in the accommodation, general reason for absence, social networks, interests, country of origin, browsing data (e.g. IP address), information relating to the accommodation itself (contents of the cupboards, number of beds, alarm code, etc.), as well as any other Personal Data that you would voluntarily communicate to us.
If you are a PMC	Your name, surname, email address, phone number and your bank account information (e.g. RIB).
If you are a User	Your name, surname, desired destination, potential arrival and departure dates, email address, phone number, browsing data, as well as any other Personal Data that you would voluntarily communicate to us.
If you are a Partner	Your name, surname, company name, postal address, professional email address and professional phone number, as well as other information specified in our agreement with you.

## 4) WHAT SPECIAL CATEGORIES OF DATA ARE COLLECTED?

By way of principle, OFS does not collect, use, store or process so-called "sensitive" Personal Data, i.e. data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data used to uniquely identify a natural person, data concerning health or data concerning the sex life or sexual orientation of a natural person.

Nonetheless, OFS may collect and process so-called sensitive Data concerning Guests or Homeowners when the information is voluntarily communicated to us unsolicited. In this case, the sensitive Data that you choose to communicate to us, in particular for a better organization of the stay, will be collected and processed only if we have obtained your explicit consent.

OFS does not discriminate or permit discrimination based on national origin, race, color, religion, disability, gender, sexual orientation, political affiliation, parental status, marital status, or any other unlawful basis of discrimination.

## **5) COOKIES AND OTHER TRACKERS**

OFS uses cookies and other tracking devices on its Website. To learn more about our use of cookies and how to manage them, please see our Consent Management Platform.

## **6) WHAT MEASURES ARE TAKEN TO ENSURE PERSONAL DATA SECURITY?**

OFS takes appropriate technical and organizational measures, in accordance with applicable legal provisions (in particular: Art. 32 GDPR), to protect your Personal Data against illicit or accidental destruction, alteration or loss and unauthorized access, modification or disclosure.

To this end, we have taken technical measures (such as firewalls, encryption) and organizational measures (such as a user ID/password system, means of physical protection etc.) to ensure the ongoing confidentiality, integrity, availability and resilience of Processing systems and services.

The Data relating to your payments made on our Website is collected directly by our payment provider via a dedicated interface that you can access from our Website. Your Payment Data will be processed by our provider in accordance with the strictest security and confidentiality rules applicable in the payment card processing industry. In this regard, when you transmit your credit card information during your reservation, SSL (Secure Socket Layer) encryption technology is used to secure your transactions.

## **7) IS YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?**

By way of principle, OFS processes your Personal Data in servers located in the European Union (Ireland).

However, for the purposes indicated in part II of this Charter, we may transfer your Personal Data to internal or external recipients, like Partners, who may be located in countries offering different levels of Personal Data protection.

In any case, in addition to implementation of this Charter, OFS employs appropriate measures to ensure secure transfer of your Personal Data to an OFS entity or to an external recipient located in a country or region offering a different level of privacy from that in the country or region where the Personal Data was collected.

Apart from the Data flows necessary for the execution of your reservation for which the GDPR indicates that they can be carried out without particular guarantees, the transfers of Data to countries outside the European Economic Area which do not have an equivalent protection of Personal Data are in this case framed by the enforceable standard contractual clauses adopted

by the European Commission, accompanied by additional guarantees if necessary, allowing to ensure their complete application.

You can request more information on the guarantees in place by sending us an email at the address indicated in section 8 below.

## 8) HOW TO EXERCISE YOUR DATA RIGHTS?

You have the following rights regarding your Personal Data in our possession. You have the right to:

- Request **access** to your Personal Data collected by OFS at any time subject to legal requirements. This allows you to obtain a copy of the Personal Data we hold about you and to verify that we are processing it lawfully.
- To request the **rectification** of any Personal Data held by us which is incorrect, incomplete or inaccurate.
- Request the **deletion** of your Personal Data from our files and systems where we have no valid reason to continue to hold it.
- **Object** to our use of your Personal Data to meet our (or a third party's) legitimate interests or where we use it for direct marketing purposes.
- Request that we **limit** the processing of your Personal Data, for example, if you want us to establish its accuracy or the purposes for which we use it.
- Ask us to transfer your Personal Data to another person or organization (right to **portability**).

In addition, you also have the option, if French law applies to you, to **define instructions** for the Processing of your Personal Data after your death (so-called "post-mortem" directives).

These rights can only be exercised insofar as they do not prevent the proper execution of the agreement that binds you to OFS. You may exercise any of your rights by sending us an email to the following address: [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com).

For the purposes of confidentiality and Personal Data protection, we will need to confirm your identity in order to respond to your request. In case of reasonable doubts concerning your identity, you may be asked to include a copy of an official piece of identification, such as an ID card or passport, driver's license along with your request. A black and white copy of the relevant page of your identity document is sufficient. All requests will receive a response promptly.

Finally, you also have the right to lodge a complaint with a [data protection authority](#).

## 9) UPDATES AND QUESTIONS

The Charter is likely to evolve or be modified. When we update this Charter, we will post it on our Website with the date it was updated. Consequently, we invite you to regularly take note of it as published on the Website.

For any questions concerning the present Charter, please contact us at the address indicated in section 8 above.

## **II. SPECIFIC RULES CONCERNING YOU**



## 10) IF YOU ARE A GUEST

Guests are natural persons who have booked accommodation directly from our Website, or by phone, but also from other partners booking services (e.g. online travel agencies). We process your Personal Data according to the following characteristics:

The Purposes of the Processing of your Data	Legal Basis of the Processing of your Data	Recipients of your Data	Retention periods of your Data
<ul style="list-style-type: none"><li>• Management of your booking and your stay</li><li>• Management of the after-sales service</li></ul>	<ul style="list-style-type: none"><li>• Processing necessary for the performance of the agreement to which you are party</li></ul>	<p><u>Internal Recipients :</u></p> <ul style="list-style-type: none"><li>• Internal services of OFS (e.g. customer service, janitor)</li></ul> <p><u>External Recipients :</u></p> <ul style="list-style-type: none"><li>• Hosting provider of the Website</li><li>• Service providers working directly in the accommodations where applicable</li><li>• PMC</li><li>• Call center provider</li><li>• Payment provider</li><li>• Local authorities when required by law</li><li>• Affiliates</li></ul>	<ul style="list-style-type: none"><li>• Duration of the contractual relationship</li></ul>
<ul style="list-style-type: none"><li>• Management of your user account</li></ul>			<ul style="list-style-type: none"><li>• Until you delete your account or after 2 years of account inactivity, unless you object to it</li></ul>
<ul style="list-style-type: none"><li>• Sending marketing campaigns</li></ul>	<ul style="list-style-type: none"><li>• Processing necessary to pursue the legitimate interest of OFS to organize marketing campaigns if you already are one of our customers, or</li><li>• Your consent</li></ul>		<ul style="list-style-type: none"><li>• Until you withdraw your consent if applicable, or object to receiving marketing communications, or 3 years from your last contact with us</li></ul>
<ul style="list-style-type: none"><li>• Litigation management</li></ul>	<ul style="list-style-type: none"><li>• Processing necessary to pursue the legitimate interest of OFS to improve its service, and defend its interests</li></ul>		<ul style="list-style-type: none"><li>• Where applicable, your data are kept for the duration of the litigation</li></ul>
<ul style="list-style-type: none"><li>• Satisfaction surveys</li></ul>			<ul style="list-style-type: none"><li>• For as long as necessary to fulfill the purpose of the survey or until you exercise your right to object or withdraw your consent</li></ul>
<ul style="list-style-type: none"><li>• Fraud management</li></ul>			<ul style="list-style-type: none"><li>• 90 days for analysis and control purposes, then 2 years in a separate database for the purpose of improving the operation of the system.</li><li>• In the case of registration in the incident file, 2 years from the date of registration or until the situation is resolved if this occurs before</li></ul>

The Purposes of the Processing of your Data	Legal Basis of the Processing of your Data	Recipients of your Data	Retention periods of your Data
<ul style="list-style-type: none"> <li>Disputing unpaid bills</li> </ul>			<ul style="list-style-type: none"> <li>5 years in the absence of a resolution, and 48h after resolution of the dispute, following the observation of the resolution.</li> </ul>
<ul style="list-style-type: none"> <li>Improving the Website through the use of cookies</li> </ul>			<ul style="list-style-type: none"> <li>Your Data is kept for a maximum of 25 months</li> </ul>
<ul style="list-style-type: none"> <li>Management of our newsletter</li> </ul>	<ul style="list-style-type: none"> <li>Your consent</li> </ul>		<ul style="list-style-type: none"> <li>Until you unsubscribe or 3 years from your last contact with us</li> </ul>
<ul style="list-style-type: none"> <li>Accounting and tax management</li> </ul>	<ul style="list-style-type: none"> <li>Processing necessary to comply with a legal obligation</li> </ul>		<ul style="list-style-type: none"> <li>For the applicable prescription period: 6 years for tax matters, or 10 years for accounting documents</li> </ul>

## 11) IF YOU ARE A HOMEOWNER

Homeowners are the natural persons who own the accommodation proposed for booking on the Website. OFS may collect the Personal Data of the Homeowners directly, but also collect them indirectly via the PMCs. We process your Personal Data according to the following characteristics:

The Purposes of the Processing of your Data	Legal Basis of the Processing of your Data	Recipients of your Data	Retention periods of your Data
<ul style="list-style-type: none"><li>• Management of the rental of your accommodation</li><li>• Management of the contractual relationship</li></ul>	<ul style="list-style-type: none"><li>• Processing necessary for the performance of the agreement to which you are party</li></ul>	<p><u>Internal Recipients :</u></p> <ul style="list-style-type: none"><li>• Internal services of OFS (e.g. customer service, janitor)</li></ul> <p><u>External Recipients :</u></p> <ul style="list-style-type: none"><li>• Hosting provider of the Website</li><li>• Payment provider</li><li>• Local authorities when required by law</li><li>• Affiliates</li></ul>	<ul style="list-style-type: none"><li>• Duration of the contractual relationship</li></ul>
<ul style="list-style-type: none"><li>• Management of your user account</li></ul>			<ul style="list-style-type: none"><li>• Until you delete your account or after 2 years of account inactivity, unless you object to it</li></ul>
<ul style="list-style-type: none"><li>• Sending marketing campaigns</li></ul>	<ul style="list-style-type: none"><li>• Processing necessary to pursue the legitimate interest of OFS to organize marketing campaigns if you already are one of our customers, or</li><li>• Your consent</li></ul>		<ul style="list-style-type: none"><li>• Until you withdraw your consent if applicable, or object to receiving marketing communications, or 3 years from your last contact with us</li></ul>
<ul style="list-style-type: none"><li>• Litigation management</li></ul>	<ul style="list-style-type: none"><li>• Processing necessary to pursue the legitimate interest of OFS to improve its service, and defend its interests</li></ul>		<ul style="list-style-type: none"><li>• Where applicable, your data are kept for the duration of the litigation</li></ul>
<ul style="list-style-type: none"><li>• Satisfaction surveys</li></ul>			<ul style="list-style-type: none"><li>• For as long as necessary to fulfill the purpose of the survey or until you exercise your right to object or withdraw your consent</li></ul>
<ul style="list-style-type: none"><li>• Improving the Website through the use of cookies</li></ul>			<ul style="list-style-type: none"><li>• Your Data is kept for a maximum of 25 months</li></ul>

The Purposes of the Processing of your Data	Legal Basis of the Processing of your Data	Recipients of your Data	Retention periods of your Data
<ul style="list-style-type: none"><li>• Management of our newsletter</li></ul>	<ul style="list-style-type: none"><li>• Your consent</li></ul>		<ul style="list-style-type: none"><li>• Until you unsubscribe or 3 years from your last contact with us</li></ul>
<ul style="list-style-type: none"><li>• Accounting and tax management</li></ul>	<ul style="list-style-type: none"><li>• Processing necessary to comply with a legal obligation</li></ul>		<ul style="list-style-type: none"><li>• For the applicable prescription period: 6 years for tax matters, or 10 years for accounting documents</li></ul>
<ul style="list-style-type: none"><li>• Comply with all applicable legislation</li></ul>			<ul style="list-style-type: none"><li>• Duration fixed in the applicable law</li></ul>

## 12) IF YOU ARE A PMC

PMCs are real estate management companies. OFS may collect the Personal Data of the representatives and staff members of the PMC. We process your Personal Data according to the following characteristics:

The Purposes of the Processing of your Data	Legal Basis of the Processing of your Data	Recipients of your Data	Retention periods of your Data
<ul style="list-style-type: none"> <li>Management of the contractual relationship</li> </ul>	<ul style="list-style-type: none"> <li>Processing necessary for the performance of the agreement to which you are party</li> </ul>	<p><b>Internal Recipients :</b></p> <ul style="list-style-type: none"> <li>Internal services of OFS (e.g. commercial service)</li> </ul> <p><b>External Recipients :</b></p> <ul style="list-style-type: none"> <li>Payment provider</li> <li>Local authorities when required by law</li> <li>Affiliates</li> </ul>	<ul style="list-style-type: none"> <li>Duration of the contractual relationship</li> </ul>
<ul style="list-style-type: none"> <li>Litigation management</li> </ul>	<ul style="list-style-type: none"> <li>Processing necessary to pursue the legitimate interest of OFS to defend its interests</li> </ul>		<ul style="list-style-type: none"> <li>Where applicable, your data are kept for the duration of the litigation</li> </ul>
<ul style="list-style-type: none"> <li>Accounting and tax management</li> </ul>	<ul style="list-style-type: none"> <li>Processing necessary to comply with a legal obligation</li> </ul>		<ul style="list-style-type: none"> <li>For the applicable prescription period: 6 years for tax matters, or 10 years for accounting documents</li> </ul>

## 13) IF YOU ARE A USER

Users are the physical persons navigating on the Website. OFS may collect Personal Data from Users. We process your Personal Data according to the following characteristics:

The Purposes of the Processing of your Data	Legal Basis of the Processing of your Data	Recipients of your Data	Retention periods of your Data
<ul style="list-style-type: none"> <li>Management of your requests and contacts</li> </ul>	<ul style="list-style-type: none"> <li>Processing necessary to pursue the legitimate interest of OFS to provide and improve the quality of its service</li> </ul>	<u>Internal Recipients :</u> <ul style="list-style-type: none"> <li>Internal services of OFS (e.g. commercial service)</li> </ul>	<ul style="list-style-type: none"> <li>For the duration necessary to manage your request and for a period of 3 years from your last contact with us</li> </ul>
<ul style="list-style-type: none"> <li>Improving the Website through the use of cookies</li> </ul>			<ul style="list-style-type: none"> <li>Your Data is kept for a maximum of 25 months</li> </ul>
<ul style="list-style-type: none"> <li>Management of our newsletter</li> </ul>	<ul style="list-style-type: none"> <li>Your consent</li> </ul>	<u>External Recipients :</u> <ul style="list-style-type: none"> <li>Local authorities when required by law</li> <li>Affiliates</li> <li>Hosting provider of the Website</li> </ul>	<ul style="list-style-type: none"> <li>Until you unsubscribe or 3 years from your last contact with us</li> </ul>

## 14) IF YOU ARE A PARTNER

When OFS contracts with a Partner (provider or supplier), we collect the Personal Data of the representatives and staff members of the latter. These Personal Data are of a professional nature. We process your Personal Data according to the following characteristics:

The Purposes of the Processing of your Data	Legal Basis of the Processing of your Data	Recipients of your Data	Retention periods of your Data
<ul style="list-style-type: none"> <li>Management of the contractual relationship</li> </ul>	<ul style="list-style-type: none"> <li>Processing necessary for the performance of the agreement to which you are party</li> </ul>	<p><b><u>Internal Recipients :</u></b></p> <ul style="list-style-type: none"> <li>Internal services of OFS (e.g. commercial service)</li> </ul> <p><b><u>External Recipients :</u></b></p> <ul style="list-style-type: none"> <li>Local authorities when required by law</li> <li>Affiliates</li> </ul>	<ul style="list-style-type: none"> <li>Duration of the contractual relationship</li> </ul>
<ul style="list-style-type: none"> <li>Litigation management</li> </ul>	<ul style="list-style-type: none"> <li>Processing necessary to pursue the legitimate interest of OFS to defend its interests</li> </ul>		<ul style="list-style-type: none"> <li>Where applicable, your data are kept for the duration of the litigation</li> </ul>
<ul style="list-style-type: none"> <li>Accounting and tax management</li> </ul>	<ul style="list-style-type: none"> <li>Processing necessary to comply with a legal obligation</li> </ul>		<ul style="list-style-type: none"> <li>For the applicable prescription period: 6 years for tax matters, or 10 years for accounting documents</li> </ul>

## 15) IF YOU LIVE OUTSIDE THE EUROPEAN UNION

Depending on your country of residence, specific rules of your local law may apply. You will find these below:

Country of residence	Local specificities
If you live in the United States	<ul style="list-style-type: none"> <li>• We do not sell your Personal Data. Your Data is only shared with Partners for the purposes described in this Charter under agreements that prohibit their use for any other purpose.</li> <li>• Principle 1 “Lawfulness” described in section 2 of this Charter has the following meaning: “we use Personal Data only as reasonably necessary and proportionate to achieve the lawful purposes for which it was collected as described in this Charter”.</li> <li>• Principle 10 described in section 2 of this Charter is replaced by the following: “if Personal Data is the subject of a data breach resulting in unauthorized use or disclosure, we take immediate action to remedy it and we report the incident as required by law”.</li> <li>• In addition to the rights listed in section 8, you can also object to any attempt by us to sell your information to a third party (which we do not do), except that we may transfer your data to a successor-in-interest in the event of a merger, acquisition, or sale of all or part of our business. In any case, you will <b>not be discriminated against</b> in doing business with us simply because you exercised any of these rights.</li> <li>• The U.S. Children’s Online Privacy Protection Act (“COPPA”) and similar laws require that online service providers obtain parental consent before they knowingly collect Personal Data online from children. If you are a child under 18 years old, please do not use the Website or send any personal information about yourself to us. If we learn we have collected personal information from a child under 18, we will delete that information promptly. If you believe that a child under 18 may have provided us personal information, please contact us immediately as described in section 8 above.</li> <li>• The Website may not recognize or take action in response to Do Not Track (“DNT”) signals from web browser settings. At this time, there is no generally accepted standard for what a company should do when a DNT signal is detected. In the event a final standard is established, we will assess how to appropriately respond to these signals.</li> </ul>
If you live in England	<ul style="list-style-type: none"> <li>• Applicable regulation: UK General Data Protection Regulation (UK GDPR) apply to OFS.</li> </ul>



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Country of residence	Local specificities
	<ul style="list-style-type: none"><li>• Personal data transfers outside of the EEA: the abovementioned framing of the personal data outside of the EEA is accompanied, where necessary, with the UK international data transfer addendum to the European Commission's standard contractual clauses for international data transfers.</li><li>• The retention period of your Data for the accounting and tax management is of 7 years.</li><li>• The data protection authority with whom you can lodge a complaint is the <a href="#">Information Commissioner's Office</a>.</li></ul>

### III. GLOSSARY

- **“Legal basis”** means what legally authorizes the implementation of a Processing, which gives the right to an organization to process Personal Data. There are several legal bases, including consent, contract, legal obligation, legitimate interest of the Data Controller, etc.
- **“Recipient”** means any person who is entitled to receive Personal Data by virtue of his or her position.
- **“Personal Data”** or **“Data”** means information that identifies you, either directly or indirectly by reference to an identifier. This may include your last name, your first name, your contact information, your image or voice, an IP address, identifiers from your computer but also your health care number, or health plan number, and every other information that can be used to identify you.
- **“Purpose”** means the primary purpose for which we use Personal Data. In other words, it is the why, the reason we process your data.
- **“Data Controller”** means the person or entity who determines the purposes and means of the Processing of your Data, i.e. all the operations carried out on your Data (such as their collection, consultation, storage, etc.). In other words, it is the person who decides why and how to process your Personal Data.
- **“Affiliates”** means Lifealike Limited's subsidiaries and other affiliates involved in Lifealike Limited's business.
- **“Data Processor”** means the natural or legal person (company or public body) who processes data on behalf of the Controller, in the context of a service or performance. Relations with our Data Processors are governed by data processing agreements, in accordance with the applicable legal requirements.
- **“Processing”** means an operation, or a set of operations, concerning Personal Data, whatever the process used (collection, recording, organization, conservation, adaptation, modification, extraction, consultation, use, communication by transmission or diffusion or any other form of provision, reconciliation, etc.).
- **“UK General Data Protection Regulation / UK GDPR”** means the retained EU law version of the GDPR as modified by English laws.