

# PRIVACY POLICY

Last updated December 15, 2025.

This Privacy Policy for Lifealike Limited, a United Kingdom company trading and doing business as “onefinestay” and its affiliates (“onefinestay”, “OFS”, “we,” “us,” or “our”), is applicable to our websites, applications, and platforms, and to all of the products and services provided and distributed by us via such websites, applications, and platforms (collectively, our “Services”). This Policy describes how and why we collect, store, use, share, and protect (“Process”) your personally identifiable information (“PII” or “Personal Data”) via our websites, applications, and platforms, during our provision of Services, and when you may use our Services. This Policy also provides information about the rights and choices you have with respect to the Personal Data we maintain.

## SUMMARY

By using our Services, you agree to let us collect and use your Personal Data as described in this Policy. Therefore, before you provide us with any Personal Data, you should review this Policy carefully, and in its entirety, to ensure you understand its terms.

This Policy covers our websites, applications, and platforms (collectively, “Websites”), along with all of our Services offerings. So, when you read “Services” in this Policy, please understand that we are referencing any combination of one or more of them as the context of use provides and requires. Also, if we refer to our “Terms”, then we mean the “Terms and Conditions” that you agree to when you purchase or enroll to receive our Services. Further definitions of capitalized terms used herein can be found in the Glossary located at the end of this Policy.

What Personal Data do we Process? Depending upon how you chose to visit, use, and interact with our Websites and Services, the Personal Data we Process may include information relating to (i) persons booking accommodations (“Guests”), (ii) owners of accommodations (“Homeowners”), (iii) third-party property management companies (“PMC”), (iv) our various service providers and suppliers (“Partners”), and (v) general users of our Websites and/or Services (“Users”). In this respect, we act as a Data Controller.

How and Why do we Process your Personal Data? We Process your Personal Data to provide, improve, and administer our Services, communicate with you for safety and security purposes, and to comply with Applicable Law. We may also Process your information for other purposes with your express consent. We Process your information fairly, securely, and only when we have a valid legal reason to do so. In this respect, we act as a Data Processor.

We have operations throughout the world, including within the European Union (EU), the United Kingdom (UK,) and the United States (US). Accordingly, our data protection obligations necessarily include compliance with applicable UK legislation such as the Data Protection Act of 2018, EU legislation such as the EU General Data Protection Regulation 2016/679 (GDPR), US legislation such as the California Consumer Privacy Act (CCPA; Cal. Civ. Code § 1798.100 et seq.), and other Applicable Law. For additional terms which may apply to you based on your residency status or location, please refer to Sections II(6) and II(7) of this Policy which outlines certain residency-specific terms. To be clear, all information in this Policy is applicable to you unless otherwise indicated based on your residency status.

Questions or Concerns? Reading this Policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices as stated herein, then discontinue use of our Websites,

and please do not use our Services. Regardless, if you have any questions or concerns about this Policy, then you may contact us via email at [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com), or by any other means provided at <https://www.onefinestay.com/contact-us>, or by post to Lifealike Limited c/o Mazars LLP, The Pinnacle, 160 Midsummer Boulevard, Milton Keynes, Buckinghamshire, UK, MK9 1FF.

Note that to the extent that any provisions of this Policy are inconsistent with Applicable Law, or to the extent you provide your express consent for uses not specifically described herein, then such Applicable Law and/or your express consent, will govern our use of your Personal Data.

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

### **1. TO WHOM DOES THIS POLICY APPLY?**

This Policy applies to Guests, Homeowners, PMCs, Partners, Users, and all others receiving our Services.

If you stay in one of the accommodations listed on our Websites as a Guest, then under certain circumstances your Personal Data may be shared with the Homeowner, a PMC, Partners, and/or government authorities (*e.g.*, to comply with Applicable Law, for booking and Services facilitation, communication, Partner coordination purposes, for security/safety reasons, etc.).

The Personal Data of Homeowners is not shared with Guests, but under certain circumstances such may be shared with third parties such as PMCs, insurers, Partners, and/or government authorities (*e.g.*, to

comply with Applicable Law, for booking and Services facilitation, communication, Partner coordination purposes, for security/safety reasons, etc.).

Listed and offered accommodations on our Websites are not owned by us. Accommodations presented on our Websites are listed via agreement by and between the Homeowner and us and/or via a PMC/Partner.

## 2. HOW DO WE PROCESS PERSONAL DATA?

We Process Personal Data according to the terms of this Policy, in compliance with Applicable Law, and according to the following principles:

1. **Lawfulness.** Process Personal Data only if there is a legal basis to do so (*e.g.*, as presented in the GDPR), and facilitate the informed exercise of the data subject's rights.
2. **Fairness, Transparency, Identified Purposes.** Clearly inform data subjects of how, when, and why we Process Personal Data.
3. **Data Minimization.** Process only the minimum amount of Personal Data required to perform and facilitate the Services.
4. **Security.** Use at least industry-standard measures to maintain integrity, confidentiality, and overall security or Personal Data Processed.

## 3. WHAT PERSONAL DATA IS COLLECTED?

We collect Personal Data for a wide range of purposes, but the main reason we collect Personal Data is to offer you the best possible Services experience. Provided you have specifically consented for us to do so, we may collect Personal Data to enhance your experience when visiting our Websites. Regardless of the purpose, we make sure we do not collect more information than necessary, or collect information for purposes that are different, unrelated, or incompatible with what's detailed in this Policy.

We collect the categories of Personal Data about you as identified in this Policy (*e.g.*, within the charts below) depending on the Services you may use, depending on the Websites you access our Services from, depending on your device and account settings, depending on the contractual Terms you may have agreed and consented to, and depending on the relationship you have with us (*e.g.*, Guest, Homeowner, PMC, User, Partner, etc.). We may collect this Personal Data when you voluntarily provide it to us, when you use our Services, when you use our Websites, or when we legally receive such from third parties.

Not all categories of Personal Data will be collected or received about every person. Please note that Personal Data does not include publicly available information from government records and de-identified or aggregated consumer information.

Category of Data Subjects	Personal Data Processed
If you are a Guest	<p>Your name, surname, email address, phone number, interests, dietary habits, postal address, occupation, country of residence, country of origin, date of birth, ID card, photograph (optional), credit card and payment information (as applicable, <i>e.g.</i>, for some of our janitorial services), reservation information, browsing information (<i>e.g.</i> IP address, device IDs), as well as any other Personal Data that you voluntarily communicate to us.</p> <p>Information you voluntarily provide regarding your marketing preferences or in the course of participating in surveys, contests, or</p>

	<p>promotional offers.</p> <p>Photograph and images/footage captured/recorded on CCTV or other audio, video and related security/monitoring systems or captured during marketing/public filming events/sessions (including recording of virtual or live workshops or similar events/sessions), voice search functionality to enable a voice command feature that allows you to ask a question and see results (functionality enabled for mobile applications only), and/or audio video recording and transcription during meetings.</p> <p>See also “If you are a User” below.</p>
If you are a Homeowner	<p>Your name, surname, household composition, email address, postal address, phone number, occupation, 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 voluntarily communicate to us.</p> <p>Photograph, and images/footage captured/recorded on CCTV or other audio, video and related security/monitoring systems or captured during marketing/public filming events/sessions (including recording of virtual or live workshops or similar events/sessions), voice search functionality to enable a voice command feature that allows you to ask a question and see results (functionality enabled for mobile applications only), and/or audio video recording and transcription during meetings.</p> <p>See also “If you are a User” below.</p>
If you are a PMC	<p>Your name, surname, email address, phone number and your bank account information (e.g. RIB).</p> <p>See also “If you are a User” below.</p>
If you are a Partner	<p>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.</p> <p>See also “If you are a User” below.</p>
If you are a User	<p>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 voluntarily communicate to us.</p> <p>Information you voluntarily provide regarding your marketing preferences or in the course of participating in surveys, contests, or promotional offers.</p> <p>Content and/or payload data of chat messages between you and our representatives, provided you have specifically consented to us collecting such Personal Data and/or messages in accordance with Applicable Law.</p>

	<p>We automatically collect certain information when you visit, use, or navigate our Websites (e.g., Cookies). This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, device IDs, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Websites, and other technical information. This information is primarily needed to enhance User experience, to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.</p> <p>We may collect the following types of information automatically via cookies, pixels, browser web storage, web beacons, and similar technologies: data related to User activity (e.g., when and how you use the Services and interact with our communications including emails), browsing history, search and clickstream history, online website tracking information, other data related to User activity, and URL referral header information.</p>
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**Information Collected through Third Parties.** We may receive marketing information from third parties including vendors and data providers, which may include information from consumer lists, public databases, and online memberships, or other information created through technology matching and modeling.

We use third-party software to proactively facilitate, introduce, or offer electronic communications including online chat Services in order to provide you with enhanced and exceptional Website related Services. Online chat Services include messaging between Users and our representatives as well as other forms of email and text messaging. Online chat Services are available only to Users who provide their informed express consent to the collection of their email and/or IP addresses, and the association of that information, as well as the logs of all chat history, with the other types of Personal Data we collect.

**How Long Will You Use My Personal Data?** We will retain your Personal Data only for as long as necessary to appropriately provide and promote our Services, and/or as required by Applicable Law. We maintain specific records management and retention policies and procedures so that your Personal Data is deleted after a reasonable time according to the following retention criteria:

- We retain your Personal Data as long as we have an ongoing relationship with you (in particular, if you have an active account with us).
- We will only keep the Personal Data while your account is active or for as long as needed to appropriately provide our Services to you.
- We retain your Personal Data for as long as needed in order to comply with our global legal and contractual obligations.
- We will retain your Personal Data if we need it for other legitimate lawful purposes, such as to prevent harm, investigate possible violations of our Terms or other policies, investigate reports of abuse, or protect ourselves or others.

Although our systems are designed to delete some of your Personal Data automatically, we cannot promise that deletion will take place by a specific time/date. In some cases, we need to comply with legal requirements to store your Personal Data which stops us from deleting such. Other reasons we may be required to keep your Personal Data are if we get reports of abuse or other Terms or policy

violations. Finally, we may also keep certain Personal Data in backup for a limited period of time or as required by Applicable Law. *See also* the specified Personal Data retention periods within the Guest, Homeowner, PMC, and User tables within Section II of this Policy (“Specific Rules Concerning You”).

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

By way of principle, we do not collect, use, store or Process "sensitive" Personal Data, i.e. data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, 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.

Nonetheless, we may collect and Process “sensitive” Personal Data concerning Guests or Homeowners when the information is voluntarily communicated to us unsolicited. In this case, the sensitive Personal Data that you choose to communicate to us, in particular for a better organization of the Services, will be collected and Processed only if we have obtained your express consent.

#### 5. COOKIES AND OTHER TRACKERS

Like many businesses, we collect information through cookies and similar technologies. We use our own and third-party cookies & tracking devices on our Websites for analytics and advertising purposes. Our Cookie Notice sets out specific information about how we use such technologies and how you can manage your cookie consent through our Consent Management Platform. We, along with our third-party marketing partners, may use session ID and/or persistent cookies, invisible pixels, and web beacons. For the session ID cookie, once a User closes the browser, the cookie simply terminates. A persistent cookie is a small text file stored on a User's hard drive for an extended period of time. Persistent cookies can be removed by following Internet browser help file directions. By showing how and when you use our Websites, cookies help us discern which areas are popular and which are not, and assist in targeting information based on your interests. Cookies also allow us to store the personal preferences that you set during each visit to our Websites, which in turn allows us to speed up your future activities at our Websites.

Cookies employed on our Websites include but are not limited to the following: Rakuten Advertising

Cookie ID	Purpose	Expiration
rmuid	Targeting cookies used by Rakuten Advertising Affiliate Network. Rakuten Advertising. Privacy Policy <a href="#">here</a> .	Within 365 days

To learn more about cookies visit: [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu)

Log Files. Like most standard Websites we use log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks.

Clear GIFs (Web Beacons/Web Bugs). We employ software technology called clear GIFs (a.k.a. Web Beacons/Web Bugs) which assist in the management of content on our Websites by informing us what content is effective. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of users. The main difference between the two is that clear

GIFs are invisible on the page and are much smaller, about the size of the period at the end of this sentence. In addition, we may use clear GIFs in our HTML-based emails to let us know which emails have been opened by the recipients. While common animated GIFs are pictures, clear GIFs are hidden tracking tools that collect Personal Data without the User seeing them, acting like a digital footprint to understand User behavior. This Personal Data helps us measure content popularity, track campaign effectiveness, and personalize content, similar to how cookies work but embedded in the content itself.

**Do Not Track (“DNT”) Signals.** DNT signals are a browser setting that sends a request to websites, asking them not to track your online activity. When you enable the DNT option in your browser, it adds a special "Do Not Track" request to your web traffic's HTTP header field (indicating your preference for web browser tracking). Because it's a request and not a legally binding rule, we currently do not recognize DNT signals. Further, we work with third parties that use tracking technologies on our Websites in order to provide tailored advertisements on our behalf and on behalf of our Partners. These third parties may collect information about your activity on our Websites and your interaction with advertising and other communications. This information may then be used to determine which ads you see on our Websites.

Most browsers are initially set to accept cookies and DNT signals. You can set your browser to notify you when you have received a cookie or DNT signal, giving you the opportunity to decide whether to accept it. You have the option to reject our cookies and/or DNT signals and still use our Websites, but you may not be able to access or use some features (*e.g.*, certain Guest account functions, referral and/or loyalty program functions, etc.). Check your browser's Help or Settings menu or your built-in mobile device settings to find out how to manage your cookie and/or DNT signal preferences. Some mobile devices store cookies and/or DNT signals not only in areas connected to the browser but also in areas that are application specific. Check your application settings options to manage those preferences.

**Automated Decision Making.** We do not use automated decision-making that results in automated decisions about your Personal Data being taken (including profiling) that legally affect you or similarly significantly affect you. Automated decisions are decisions made automatically based on computer determinations (using software algorithms), without human review.

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

We employ appropriate technical and organizational measures in accordance with Applicable Law (*e.g.*, Art. 32 GDPR) and otherwise to protect your Personal Data against illicit or accidental destruction, alteration or loss, and unauthorized access, modification or disclosure. We have also taken certain technical measures (such as firewalls, encryption) and organizational measures (such as two-factor authentication, ID/password requirements, etc.) to preserve the ongoing confidentiality, integrity, availability and resilience of Processing systems and methods.

The Personal Data relating to any payments accessed and made via our Websites is collected directly by our payment providers via a dedicated interface. Your Payment Data is processed by our providers 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.

Despite these measures, no system is impenetrable. We cannot guarantee the security of electronic data nor can we guarantee that the Personal Data you provide will not be intercepted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of or you believe are reasonable. We ask you not to share a password with anyone. Any unauthorized access to or use of our Websites or information collected and maintained by

our Websites should be immediately brought to our attention by contacting us as [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com).

**Links to Other Websites.** As part of our Websites and/or Services, we may provide links to other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Policy applies solely to information collected by us through our Websites and/or Services. Therefore, this Policy does not apply to your use of a third-party website accessed by selecting a link on our Websites or via our Services. To the extent that you access or use the Services through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage you to read the privacy policy of other websites before proceeding to use them.

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

Typically, we Process your Personal Data in servers located in the European Union (*e.g.*, Ireland). However, for the purposes indicated in Part II of this Policy, we may transfer your Personal Data to internal or external recipients, like Affiliates and Partners, who may be located in countries offering different levels of Personal Data protection. In such case, we employ appropriate measures to ensure the secure transfer of your Personal Data to such recipients in accordance with Applicable Law.

Apart from the Personal 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 Personal Data to countries outside the European Economic Area (EEA) 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 an appropriate email to [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com). *See also* the Supplemental EEA Privacy Notice Sect II(8) of this Policy.

## **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 at any time subject to legal requirements. This allows you to obtain a copy of the Personal Data and 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.
- Ask us to transfer your Personal Data to another person or organization (right to portability).
- Withdraw your previously provided consent and/or opt-out of continuing to receive communications from us related to our Services or third parties other than those that you have inquired about or are receiving.

You may opt-out of and unsubscribe from receiving commercial messages from us (*e.g.*, e-mails, telephone calls, texts, etc.) at any time by following the opt-out/unsubscribe instructions contained in such messages, by replying “Stop” to such messages, and/or by sending an appropriate email to [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com). Please note that even if you unsubscribe from these commercial communications,



we may still send you non-commercial (transactional) messages including Services-related satisfaction surveys, messages related to your Services account, and messages related to your Services transactions.

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). You may have additional rights not listed above based on your residency status. Please refer to Sections II(6) and II(7) of this Policy which outlines certain additional residency-specific rights.

These rights can only be exercised insofar as they do not prevent the proper performance of the agreement between us. You may exercise any of your rights by sending an appropriate email to [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com).

For the purposes of confidentiality and Personal Data protection, we may 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, passport, or driver's license along with your request. A black and white copy of the relevant page of your identity document is sufficient. Upon receipt, all requests will be appropriately and promptly responded to.

Finally, you also have the right to lodge a complaint with a Data Protection Authority in the EEA.

## **9. POLICY UPDATES AND QUESTIONS**

We may, at our sole discretion, revise this Policy at any time in a manner consistent with Applicable Law. When we revise this Policy, we will incorporate the revisions into this Policy and will revise the "last updated" date at the top of this Policy. Please check this Policy periodically for the most current version and to confirm your continued agreement with its terms, which will be inferred by your continued association with us following any such modifications. If you do not agree with our policies and practices as stated herein, then discontinue use of our Websites, and please do not use our Services

If you have any questions or concerns about this Policy, then you may contact us via email at [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com), or by any other means provided at <https://www.onefinestay.com/contact-us>, or by post to Lifealike Limited c/o Mazars LLP, The Pinnacle, 160 Midsummer Boulevard, Milton Keynes, Buckinghamshire, United Kingdom, MK9 1FF.

End of Section I.

Section II "Specific Rules Concerning You" Follows.

## II. SPECIFIC RULES CONCERNING YOU

### 1) IF YOU ARE A GUEST

Guests are natural persons who have booked accommodation directly via our Websites, or by phone, but also from other PMC and/or Partner booking services (e.g. online travel agencies). We Process Guest Personal Data according to the following criteria:

The Purposes of the Processing of your Personal Data	Legal Basis of the Processing of your Personal Data	Recipients of your Personal Data	Retention periods of your Personal Data
<ul style="list-style-type: none"><li>● Management of your booking and your stay Services</li><li>● Management of the after-sales Services</li></ul>	<ul style="list-style-type: none"><li>● Processing necessary for the performance of the agreement to which you are party</li><li>● To establish your account</li><li>● to provide assistance or support with respect to your use of our Services</li><li>● Your consent</li></ul>	<p><b>Internal Recipients:</b></p> <ul style="list-style-type: none"><li>● Internal services of OFS (e.g. customer service, janitor)</li></ul> <p><b>External Recipients:</b></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 Services 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>● Services-related, Informational, Marketing, and Promotional communications and materials</li></ul>	<ul style="list-style-type: none"><li>● Processing necessary to pursue the legitimate interest of OFS to organize Services-related, Informational, Marketing, and Promotional communications and campaigns if you are already a customer of ours, and/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 Services, preserve/assert its rights, and defend its interests</li><li>● Your consent</li></ul>		<ul style="list-style-type: none"><li>● Where applicable, your Personal Data is 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>

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The Purposes of the Processing of your Personal Data	Legal Basis of the Processing of your Personal Data	Recipients of your Personal Data	Retention periods of your Personal 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>



## 2) IF YOU ARE A HOMEOWNER

Homeowners are the natural persons who own the accommodations proposed for booking on our Websites. We may collect the Personal Data of the Homeowners directly, but may also collect such indirectly via the PMCs. We Process Homeowner Personal Data according to the following criteria:

The Purposes of the Processing of your Personal Data	Legal Basis of the Processing of your Personal Data	Recipients of your Personal Data	Retention periods of your Personal 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><li>● Your consent</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>● Services-related, Informational, Marketing, and Promotional communications and materials</li></ul>	<ul style="list-style-type: none"><li>● Processing necessary to pursue the legitimate interest of OFS to organize Services-related, Informational, Marketing, and Promotional communications and campaigns if you are already a customer of ours, and/or 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 Personal Data is 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>

# onefinestay

The Purposes of the Processing of your Personal Data	Legal Basis of the Processing of your Personal Data	Recipients of your Personal Data	Retention periods of your Personal 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>

## 3) IF YOU ARE A PMC

PMCs are typically real estate management companies. We may collect the Personal Data of the representatives and staff members of the PMC. We Process PMC Personal Data according to the following criteria:

The Purposes of the Processing of your Personal Data	Legal Basis of the Processing of your Personal Data	Recipients of your Personal Data	Retention periods of your Personal 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> <li>Your consent</li> </ul>	<p><u>Internal Recipients:</u></p> <ul style="list-style-type: none"> <li>Internal services of OFS (e.g. commercial service)</li> </ul> <p><u>External Recipients:</u></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 Personal Data is 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>



#### 4) IF YOU ARE A USER

Users are the physical persons navigating our Websites. Users may also be Guests, Homeowners, PMCs, or Partners. We may collect Personal Data from Users. We Process Users Personal Data according to the following criteria:

The Purposes of the Processing of your Personal Data	Legal Basis of the Processing of your Personal Data	Recipients of your Personal Data	Retention periods of your Personal 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><li>Your consent</li></ul>	<u>Internal Recipients:</u> <ul style="list-style-type: none"><li>Internal services of OFS (e.g. commercial service)</li></ul> <u>External Recipients:</u> <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>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><li>Providing User Website support via AI/chatbots</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>Services-related, Informational, Marketing, and Promotional communications and materials</li></ul>	<ul style="list-style-type: none"><li>Processing necessary to pursue the legitimate interest of OFS to organize Services-related, Informational, Marketing, and Promotional communications and campaigns if you are already a customer of ours, and/or</li><li>Your consent</li></ul>		

## 5) IF YOU ARE A PARTNER

When we contract with a Partner (provider, vendor, or supplier), we may collect the business-related Personal Data of the representatives and staff members. We Process Partner Personal Data according to the following criteria:

The Purposes of the Processing of your Personal Data	Legal Basis of the Processing of your Personal Data	Recipients of your Personal Data	Retention periods of your Personal 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><u>Internal Recipients:</u></p> <ul style="list-style-type: none"> <li>Internal services of OFS (e.g. commercial service)</li> </ul> <p><u>External Recipients:</u></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 Personal Data is 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>





## 6) IF YOU LIVE OUTSIDE THE EUROPEAN UNION

Depending on your country of residence, specific Applicable Law may apply.

Country of residence	Local specificities
If you live in the UK	<ul style="list-style-type: none"><li>• Applicable Law: UK GDPR.</li><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 Personal Data for the accounting and tax management is 7 years.</li><li>• The data protection authority with whom you can lodge a complaint is the <u>Information Commissioner's Office</u>.</li></ul>
If you live in the US	<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 Policy under agreements that prohibit their use for any other purpose.</li><li>• We use Personal Data only as reasonably necessary and proportionate to achieve the lawful purposes for which it was collected as described in this Policy.</li><li>• 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 Applicable 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 Personal 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 not be discriminated against 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, then please contact us immediately.</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><li>• <i>See Also</i> the Section II-7 below (US State Specific Privacy Rights).</li></ul>

## **7. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

If you are a resident of certain US states such as California, Colorado, Connecticut, Utah, and Virginia, then you are granted specific rights regarding access to your personal information.

### **California Residents**

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our Users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided herein.

If you are under 18 years of age, reside in California, and have a registered account with the Services, you have the right to request the removal of unwanted Personal Data that you publicly post on the Services. To request the removal of such Personal Data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the Personal Data is not publicly displayed on the Services, but please be aware that the Personal Data may not be completely or comprehensively removed from all our systems (*e.g.*, backups, etc.).

### **CCPA Privacy Notice**

This section applies only to California residents. Under the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act of 2020 ("CPRA"), you have the rights listed below. Except where specifically noted below, both the CCPA and the CPRA are collectively referred to as the CCPA in this Privacy Policy.

The California Code of Regulations defines a "resident" as:

(1) every individual who is in the State of California for other than a temporary or transitory purpose; and

(2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

### **Your rights with respect to your Personal Data**

#### **Right to request deletion of the Personal Data — Request to delete**

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any Processing that may be required to protect against illegal activities.

#### **Right to be informed — Request to know**

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;

- whether we sell or share personal information to third parties;
- the categories of personal information that we sold, shared, or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- the business or commercial purpose for collecting, selling, or sharing personal information; and
- the specific pieces of personal information we collected about you.

In accordance with Applicable Law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

### **Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights**

We will not deny services, charge different prices, offer a different quality of service, or otherwise discriminate against you for exercising your California, Virginia, Colorado, Connecticut or Utah privacy rights, as applicable. Nothing in this section prohibits us from charging you a different price or rate, or from providing a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to you by the use of your Personal Data. With your consent, we may choose to offer you financial incentives directly related to the value of your personal information for the collection, sale, or deletion of your personal information.

### **Right to Limit Use and Disclosure of Sensitive Personal Information**

In California, we do not Process consumer's sensitive personal information.

### **Verification Process**

Upon receiving your request, we will need to verify your identity to determine you are the same person from whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use the personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additional information as soon as we finish verifying you.

### **Other privacy rights**

- You may object to the Processing of your personal information.
- You may request correction of your Personal Data if it is incorrect or no longer relevant or ask to restrict the Processing of the information.
- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent who does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.

You can opt out of the selling or sharing of your personal information by disabling cookies in Cookie Preference Settings and clicking on the Do Not Sell or Share My Personal Information link on our homepage.

To exercise these rights, you can contact us by visiting [onefinestay.com](https://onefinestay.com), by email at [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com), or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your Personal Data, we would like to hear from you.

## **Colorado Residents**

This section applies only to Colorado residents. Under the Colorado Privacy Act (CPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are Processing your Personal Data
- Right to access your Personal Data
- Right to correct inaccuracies in your Personal Data
- Right to request deletion of your Personal Data
- Right to obtain a copy of the Personal Data you previously shared with us
- Right to opt out of the Processing of your Personal Data if it is used for targeted advertising, the sale of Personal Data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

We sell Personal Data to third parties or Process Personal Data for targeted advertising. You can opt out of the sharing of your Personal Data, targeted advertising, or profiling by disabling cookies in Cookie Preference Settings. To submit a request to exercise any of the other rights described above, please email [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com).

If we decline to take action regarding your request and you wish to appeal our decision, please email us at [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com). Within forty-five (45) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

## **California and Colorado Loyalty Program Disclosures.**

If you are a resident of California or Colorado and you participate in a loyalty, rewards, premium feature, discount, or club card program established by us for the purpose of providing discounts, rewards, or other value to you in connection with your participation (each, if any, a "Loyalty Program"), we may disclose and/or share your personal information as set forth in this Privacy Policy and/or pursuant to any separate consent you may provide in connection with your participation in the Loyalty Program. You may cease your participation in any Loyalty Program at any time by following the instructions provided in connection with the Loyalty Program or by contacting us via email at [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com).

## **Connecticut Residents**

This section applies only to Connecticut residents. Under the Connecticut Data Privacy Act (CTDPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are Processing your Personal Data
- Right to access your Personal Data
- Right to correct inaccuracies in your Personal Data
- Right to request deletion of your Personal Data
- Right to obtain a copy of the Personal Data you previously shared with us
- Right to opt out of the Processing of your Personal Data if it is used for targeted advertising, the sale of Personal Data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

We share Personal Data with third parties or Process Personal Data for targeted advertising. You can opt out of the sharing of your Personal Data, targeted advertising, or profiling by disabling cookies in Cookie Preference Settings. To submit a request to exercise any of the other rights described above, please email [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com).

If we decline to take action regarding your request and you wish to appeal our decision, please email us at [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com). Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

### **Illinois Residents**

If you are a resident of Illinois and you elect to participate in any program or offering requiring you to provide biometric information to us, then we will permanently destroy such biometric information, and any information directly derived from such biometric information, when the initial purpose for collecting or obtaining such information has been satisfied or within three (3) years following your last interaction with us, whichever occurs first.

### **Nevada Residents**

If you are a resident of Nevada, in accordance with Nevada Revised Statutes Chapter 603A, you may request that we do not sell certain of your personally identifiable information (your "Covered Information" as defined in NRS Chapter 603A) by sending a request to [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com).

### **Utah Residents**

This section applies only to Utah residents. Under the Utah Consumer Privacy Act (UCPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are Processing your Personal Data
- Right to access your Personal Data
- Right to request deletion of your Personal Data
- Right to obtain a copy of the Personal Data you previously shared with us
- Right to opt out of the Processing of your Personal Data if it is used for targeted advertising or the sale of Personal Data

We share Personal Data with third parties or Process Personal Data for targeted advertising. You can opt out of the sharing of your Personal Data or targeted advertising by disabling cookies in Cookie Preference Settings. To submit a request to exercise any of the other rights described above, please email [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com).

### **Virginia Residents**

If you are a resident of Virginia, you have certain rights pursuant to the Virginia Consumer Data Protection Act (VCDPA).

"Consumer" means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

"Personal Data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal Data" does not include de-identified data or publicly available information.

"Sale of Personal Data" means the exchange of Personal Data for monetary consideration.

If this definition of "consumer" applies to you, we must adhere to certain rights and obligations regarding your Personal Data.

Your rights with respect to your Personal Data

- Right to be informed whether or not we are Processing your Personal Data
- Right to access your Personal Data

- Right to correct inaccuracies in your Personal Data
- Right to request deletion of your Personal Data
- Right to obtain a copy of the Personal Data you previously shared with us
- Right to opt out of the Processing of your Personal Data if it is used for targeted advertising, the sale of Personal Data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

We sell Personal Data to third parties or Process Personal Data for targeted advertising. Please see the following section to find out how you can opt-out from further selling or sharing of your Personal Data for targeted advertising or profiling purposes.

### **Exercise your rights provided under the Virginia VCDPA**

You can opt-out of the selling of your Personal Data, targeted advertising, or profiling by disabling cookies in Cookie Preference Settings. You may contact us by email at [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com) or visit [onefinestay.com](https://onefinestay.com).

If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

### **Verification Process**

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before Processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

### **Right to appeal**

If we decline to take action regarding your request, we will inform you of our decision and the reasoning behind it. If you wish to appeal our decision, please email us at [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com). Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may contact the Attorney General to submit a complaint.

## **8. SUPPLEMENTAL EEA PRIVACY NOTICE**

This Notice provides additional information for Users in the EEA. Users in the EEA have certain privacy rights as specified under the GDPR. Our Privacy Policy is in line with these laws - this Notice makes sure we cover the EEA-specific requirements.

By providing this Notice to you, we comply with our information obligations under GDPR. Please note that this Notice shall not confer upon you any rights or obligations that are not conferred upon you by Applicable Law.

This Notice must be read in conjunction with our Privacy Policy to understand all of the terms that apply to the Processing of your Personal Data. Any capitalized term used in this EEA Notice but not defined will have the meaning ascribed to it in the applicable privacy act or our Privacy Policy (*e.g.*, in the Glossary).

### **Legal Bases for Processing Information of EEA Users**

For more information about how we collect, use, and disclose your Personal Data, please see Our Privacy Policy. If you are from a region that requires a legal basis for Processing Personal Data (such as the EEA), our

legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned, the Services you use, how you use our Services, and the specific context in which we collect it. This means we collect and use your information only where:

- We need the Personal Data to perform a contract with you; and/or
- We need the Personal Data to provide you the Services, including to operate the Services, provide customer support and personalized features, and to protect the safety and security of the Services; and/or
- It satisfies a legitimate interest (which is not overridden by your the Personal Data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests; and/or
- You give us your express consent to do so for a specific purpose; and/or
- We need to Process your Personal Data to comply with a legal obligation, and in some cases, we may also have a legal obligation to collect the Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another person, such as in the case where we request Personal Data from you in the context of a government audit or in response to a request from law enforcement.

If you have consented to our use of Personal Data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any Processing that has already taken place. Where we are using your information because we or a third party (*e.g.*, your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services. If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Data, please contact us using the contact information provided in the Privacy Policy.

### **Transferring EEA Data Subject information outside the EU/EEA for GDPR**

We may transfer the Personal Data we collect about you to one of more countries outside the EU/EEA, including the United States, in order to perform one of the activities listed above. Where there isn't an adequacy decision by the European Commission in respect of those countries - meaning that these are not deemed to provide an adequate level of protection for your Personal Data - we have put in place the appropriate measures to ensure that your Personal Data will be secure. These measures include Data Transfer Agreements based on the European Commission's Standard Contractual Clauses. If you require further information about these protective measures, you can request it by contacting us in any of the ways listed in the Privacy Policy.

### **Automated Decisions Making**

We generally do not use your Personal Data with any automated decision-making processes.

### **Rights under GDPR**

If the Processing of your Personal Data is subject to the GDPR, then you are entitled to certain rights. You have the right to request access to your Personal Data, to have your Personal Data corrected, restricted or deleted, to withdraw any consent that you have given to the Processing of your Personal Data (without affecting the lawfulness of the Processing prior to your withdrawal of consent) and to object to our Processing of your Personal Data. You also have the right of data portability in certain circumstances, which means that you can request that we provide you (or a third party you designate) with a transferable copy of personal information that you have provided to us. Your rights may be subject to various limitations under the GDPR. If you wish to exercise any of these rights, or if you have any concerns about our Processing of your Personal Data, then please contact us in any of the ways listed in the Privacy Policy. You also have the right to file a complaint with the Data Protection Authority in the EEA.

### **What we may need from you**

If you exercise one of the above rights, we may need to request specific information from you to help us confirm your identity and that you are entitled to make such a request. This is to ensure that Personal Data is not disclosed to any person who has no right to receive it.

### **Data Protection Supervisory Authority under GDPR**

If you're not satisfied with how we Process your Personal Data and the Processing of your Personal Data is subject

to the EU GDPR, then you can lodge a complaint by contacting us in any of the ways listed in the Privacy Policy. You also have the right to file a complaint with the Data Protection Authority in the EEA.

**Data Protection Officer**

We have appointed Data Protection Officers (DPO) to oversee our compliance with applicable data protection laws and with this Notice. If you have any questions about this Notice or how we handle your Personal Data, please contact us in any of the ways listed in our Privacy Policy.

End of Section II.

Section III "Glossary of Terms" Follows.



### III. GLOSSARY OF TERMS

**"Person"** means any natural individual person as well as legal entities and public bodies as the context of use herein provides and requires.

**"Personal Data"** or **"Data"** means information that identifies a Person, either directly or indirectly by reference to an identifier. This may include a Person's last name, first name, contact information, image or voice, IP address, identifiers from a computer device used to access websites, and all other information that can be used to identify a Person.

**"Process"** or **"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.).

**"Legal Basis"** means what legally authorizes the implementation of a Processing, which gives OFS the right to Process Personal Data. Examples of Legal Basis, includes consent, contract, legal obligation, legitimate interest of the Data Controller, etc.

**"Purpose"** means the primary purpose for which OFS uses Personal Data (*i.e.*, the reason why OFS Processes Personal Data).

**"Data Controller"** means the Person who determines the purposes and means of the Processing of Personal Data, including the operations carried out on such Personal Data such as its collection, consultation, storage, etc. (*i.e.* the Person who decides why and how to Process Personal Data).

**"Data Processor"** means a Person who Processes Personal Data on behalf of a Data Controller, in the context of a service or performance. Relations with Data Processors are governed by data Processing agreements, in accordance with the requirements of Applicable Law.

**"Recipient"** means any Person who is entitled to receive Personal Data by virtue of such Person's position.

**"Applicable Law"** means any law, statute, ordinance, code, rule and/or regulation governing the rights, obligations, conduct, and performance of OFS under this Policy. Without limitation, Applicable Law includes UK, EU, and US legislation such as the UK and EU General Data Protection Regulation 2016/679 (GDPR), the Electronic Signatures in Global and National Commerce Act (ESIGN Act; 15 U.S.C. § 7001 et seq), the Uniform Electronic Transactions Act (UETA), CAN-SPAM Act, 15 U.S.C. § 7701 et seq. (2003), the Telemarketing and Consumer Fraud and Abuse Prevention Act (TCFAPA; 15 U.S.C. §§ 6101-6108), the Telephone Consumer Protection Act (TCPA; 47 U.S.C. § 227 et seq), the California Consumer Privacy Act (CCPA; Cal. Civ. Code § 1798.100 et seq.), the California Privacy Rights Act (CPRA; Cal. Civ. Code § 1798.100 et seq.), EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) and the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) via the Data Privacy Framework (DPF) Program.

**"Affiliate"** means any current or future entity that is directly or indirectly: (a) controlled by, (b) under common control with, or (c) controls OFS. For purposes of this definition, the term "control" means direct or indirect ownership of, or the right to exercise greater than ten percent (10%) of the ownership interest representing the right to make decisions for OFS. The definition of Affiliate specifically includes OFS' parents and subsidiaries.

**"Services"** means those certain products and services offerings provided and distributed by OFS via its Websites, including those products and services directly/indirectly offered, performed, and provided to Guests and Homeowners.

**"Guest"** means those Persons that have retained OFS' Services (*e.g.*, booked accommodations) directly via OFS Websites and otherwise, or indirectly from PMCs and/or Partners (*e.g.*, online travel agencies).

**"Homeowners"** means the Persons who own the accommodations proposed for booking on OFS Websites.

**"Partners"** means the various third-party vendors and suppliers OFS retains via agreement to provide certain products and services to OFS, to Guests, and/or to Homeowners. Partners assist with the provision and facilitation

of OFS Services. Partners are retained to perform certain administrative functions and information technology operations (e.g., Website maintenance), to perform credit card transaction processing and billing services, to enhance travel packages accommodation access, to provide professional services (e.g., accounting, auditing, and legal), to provide insurance, and to assist with marketing and advertising of our Services, and to administer loyalty programs, sweepstakes, and customer surveys.

“**PMC**” means third-party property management Partners.

“**User**” means any Person that visits and/or utilizes OFS Websites and/or Services, including Guests, Homeowners, Partners, and PMCs.

“**Terms**” means the Guest and Homeowner agreements available here <https://www.onefinestay.com/terms-conditions>.

“**Website(s)**” means any website, application, and/or platform owned/operated by OFS and/or its Affiliates (e.g., <https://www.onefinestay.com/>).

**Data Protection Authority.** The European Union's data protection framework involves national Data Protection Authorities (DPAs) in each member state that enforce the GDPR, alongside the European Data Protection Board (EDPB), an independent body ensuring consistent application of EU data law, promoting cooperation among DPAs, and offering guidance on the GDPR. Essentially, DPAs handle local enforcement (complaints, investigations), while the EDPB provides overarching consistency and guidance across the EU.

“**European Economic Area**” (EEA) means the Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).

If you have any questions or concerns about this Policy, then you may contact us via email at [gdpr@onefinestay.com](mailto:gdpr@onefinestay.com), or by any other means provided at <https://www.onefinestay.com/contact-us>, or by post to Lifealike Limited c/o Mazars LLP, The Pinnacle, 160 Midsummer Boulevard, Milton Keynes, Buckinghamshire, United Kingdom, MK9 1FF.