

WanderJaunt Privacy Policy

Last Updated: June 20, 2018

Thank you for using WanderJaunt!

This Privacy Policy describes how we collect, use, process, and disclose your information, including personal information, in conjunction with your access to and use of the WanderJaunt Platform and services.

If you see an undefined term in this Privacy Policy (such as “Listing” or “WanderJaunt Platform”), it has the same definition as in our Terms of Service (<https://wanderjaunt.com/terms-of-service>).

When this policy mentions “WanderJaunt,” “we,” “us,” or “our,” it refers to the WanderJaunt, Inc.

1. INFORMATION WE COLLECT

There are three general categories of information we collect.

1.1 Information You Give to Us.

1.1.1 Information that is necessary for the use of the WanderJaunt Platform.

We ask for and collect the following personal information about you when you use the WanderJaunt Platform. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested services.

- **Account Information.** When you sign up for an WanderJaunt Account, we require certain information such as your first name, last name, email address, phone number, and date of birth.
- **Identity Verification Information.** To help create and maintain a trusted environment, we may collect identity verification information (such as images of your government issued ID, passport, national ID card, or driving license, as permitted by applicable laws) or other authentication information.
- **Payment Information.** To use certain features of the WanderJaunt, we may require you to provide certain financial information (like your credit card information) in order to facilitate the processing of payments.
- **Communications with WanderJaunt.** When you communicate with WanderJaunt, we collect information about your communication and any information you choose to provide.

1.1.2 Information you choose to give us.

You may choose to provide us with additional personal information in order to obtain a better user experience when using the WanderJaunt Platform. This additional information will be processed based on your consent.

- **Additional Profile Information.** You may choose to provide additional information as part of your WanderJaunt profile (such as gender, preferred language(s), city, and a personal description). Some of this information as indicated in your Account settings is part of your public profile page, and will be publicly visible to others.
- **Address Book Contact Information.** You may choose to import your address book contacts or enter your contacts’ information manually to access certain features of the WanderJaunt Platform, like inviting them to use WanderJaunt.
- **Other Information.** You may otherwise choose to provide us information when you fill in a form, conduct a search, update or add information to your WanderJaunt Account, respond to surveys, post to community forums, participate in promotions, or use other features of the WanderJaunt Platform.]

1.2 Information We Automatically Collect from Your Use of the WanderJaunt Platform.

When you use the WanderJaunt Platform, we automatically collect information, including personal information, about the services you use and how you use them. This information is necessary for the adequate performance of the contract between you and us, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the functionalities of the WanderJaunt Platform.

- **Geo-location Information.** When you use certain features of the WanderJaunt Platform, we may collect information about your precise or approximate location as determined through data such as your IP address or mobile device's GPS to offer you an improved user experience. Most mobile devices allow you to control or disable the use of location services for applications in the device's settings menu. WanderJaunt may also collect this information even when you are not using the app if this connection is enabled through your settings or device permissions.
- **Usage Information.** We collect information about your interactions with the WanderJaunt Platform such as the pages or content you view, your searches for Listings, bookings you have made, and other actions on the WanderJaunt Platform.
- **Log Data and Device Information.** We automatically collect log data and device information when you access and use the WanderJaunt Platform, even if you have not created a WanderJaunt Account or logged in. That information includes, among other things: details about how you've used the WanderJaunt Platform (including if you clicked on links to third party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you've viewed or engaged with before or after using the WanderJaunt Platform.
- **Cookies and Similar Technologies.** We use cookies and other similar technologies, such as web beacons, pixels, and mobile identifiers. We may also allow our business partners to use these tracking technologies on the WanderJaunt Platform, or engage others to track your behavior on our behalf. While you may disable the usage of cookies through your browser settings, the WanderJaunt Platform currently does not respond to a "Do Not Track" signal in the HTTP header from your browser or mobile application due to lack of standardization regarding how that signal should be interpreted.
- **Payment Transaction Information.** WanderJaunt collects information related to your payment transactions, processed by Stripe or similar electronic payment processors, through the WanderJaunt Platform, including the payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, email address, IBAN information, your address and other related transaction details. This information is necessary for the adequate performance of the contract between you and WanderJaunt and to allow the provision of the WanderJaunt services.

1.3 Information We Collect from Third Parties.

WanderJaunt may collect information, including personal information, that others provide about you when they use the WanderJaunt Platform, or obtain information from other sources and combine that with information we collect through the WanderJaunt. We do not control, supervise or respond for how the third parties providing your information process your personal data, and any information request regarding the disclosure of your personal information to us should be directed to such third parties.

- **Third Party Services.** If you link, connect, or login to your WanderJaunt Account with a third party service (e.g. Google, Facebook, WeChat), the third party service may send us information such as your registration and profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- **Background Information.** For Members in the United States, to the extent permitted by applicable laws, WanderJaunt may obtain reports from public records of criminal convictions or sex offender registrations. For Members outside of the United States, to the extent permitted by applicable laws and with your consent where required, WanderJaunt may obtain the local version of police, background or registered

sex offender checks. We may use your information, including your full name and date of birth, to obtain such reports.

- **Other Sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or fraud detection information, from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results (with your consent where required) or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the WanderJaunt Platform through partnerships, or about your experiences and interactions from our partner ad networks.

2. HOW WE USE INFORMATION WE COLLECT

We use, store, and process information, including personal information, about you to provide, understand, improve, and develop the WanderJaunt Platform, create and maintain a trusted and safer environment and comply with our legal obligations. You agree that we may use your personal data for the following purposes:

- To enable you to access and use the WanderJaunt Platform.
- To contact you from time to time with user or service updates.
- To send other messages that help us provide our services on the WanderJaunt Platform.
- To operate, protect, improve, and optimize the WanderJaunt Platform, including content, advertising, and conversion metrics such as by performing analytics and conducting research.
- To provide customer service.
- To send you service or support messages, updates, security alerts, and account notifications.
- To promote services related to the WanderJaunt Platform and/or our affiliates.
- To compare information for accuracy, update our records, and verify it with third parties.
- To operate, protect, improve, and optimize the WanderJaunt Platform and experience, and personalize, measure, and improve our advertising and/or your experience (such as making Listing suggestions or ranking search results), we conduct profiling based on your interactions with the WanderJaunt Platform, your search and booking history, your profile information and preferences, and other content you submit to the WanderJaunt Platform.
- To verify or authenticate information or identifications provided by you (such as to verify your Accommodation address or compare your identification photo to another photo you provide).
- To conduct checks against databases and other information sources, including background or police checks, to the extent permitted by applicable laws and with your consent where required.
- To prevent, investigate or prosecute activity we think may be potentially illegal, unlawful or harmful.
- Resolve any disputes with any of our Members and enforce our agreements with third parties.
- To enforce our Privacy Policy, Terms and Conditions, and/or other policies or any other purpose referenced herein or therein.

We process this information given our legitimate interest in improving the WanderJaunt Platform and our Members' experience with it, and where it is necessary for the adequate performance of the contract with you.

3. SHARING & DISCLOSURE

We may disclose your personal data to enforce our policies, or where we are permitted (or believe in good faith that we are required) to do so by applicable law, such as in response to a request by a law enforcement or governmental authority, or in connection with actual or proposed litigation, or to protect our property, people and other rights or interests.

We may also share your personal data with:

- One of our partners if you've requested their services or if you've requested to be provided with information by them;

- The provider behind our liability insurance, including traveler information related to covered stays;
- A third party performing services on our behalf or for the WanderJaunt Platform, such as pricing, processing payments, sending communications, tracking and analyzing data, pursuant to Section 3.6 of this Privacy Policy;
- Our affiliates;
- Other companies or business entities, for example if we are thinking of a merger with or sale to that company or business entity;
- Other companies we work with to feature all or part of the property listings or otherwise provide promotional or other services related to the WanderJaunt platform. This might include featuring Listings and photographs on other websites;
- Any third party you have asked us to share your personal data with – such as Facebook if you have asked us to connect with your Facebook account; or
- Any legal or governmental entity pursuant to a subpoena or other legal request, or as necessary to remit certain taxes in the course of processing payments.

3.1 Profiles, Listings, and other Public Information.

The WanderJaunt Platform lets you publish information, including personal information, that is visible to the general public. For example:

- Parts of your public profile page, such as your first name, your description, and city, are publicly visible to others.
- Listing pages are publicly visible and include information such as the Accommodation’s approximate location (neighborhood and city), Listing description, calendar availability, your public profile photo, aggregated demand information (like page views over a period of time), and any additional information you choose to share.
- After completing a booking, Members may write Reviews and rate Accommodations they have stayed at. Reviews and Ratings may also be surfaced elsewhere on the WanderJaunt Platform (such as the Listing page).
- If you submit content in a community or discussion forum, blog or social media post, or use a similar feature on the WanderJaunt Platform, that content is publicly visible.

Based on our legitimate interest to promote the WanderJaunt Platform we may display parts of the WanderJaunt Platform (e.g., Listings) on sites operated by WanderJaunt’s business partners, using technologies such as widgets or APIs. If Listings are displayed on a partner’s site, information from your public profile page may also be displayed.

Information you share publicly on the WanderJaunt Platform may be indexed through third party search engines. If you change your settings or your public-facing content, these search engines may not update their databases. We do not control the practices of third party search engines, and they may use caches containing your outdated information.

3.2 Compliance with Law, Responding to Legal Requests, Preventing Harm and Protection of our Rights.

WanderJaunt may disclose your information, including personal information, to courts, law enforcement or governmental authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or if such disclosure is reasonably necessary: (i) to comply with our legal obligations, (ii) to comply with legal process and to respond to claims asserted against WanderJaunt, (iii) to respond to verified requests relating to a criminal investigation or alleged and/or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability, (iv) to enforce and administer our Terms of Service (<https://wanderjaunt.com/terms-of-service>), our other policies, or agreements with other Members, or (v) to

protect the rights, property or personal safety of WanderJaunt, its employees, its Members, or members of the public.

These disclosures may be necessary to comply with our legal obligations, for the protection of your or another person's vital interests or for the purposes of our or a third party's legitimate interest in keeping the WanderJaunt Platform secure, preventing harm or crime, enforcing or defending legal rights, or preventing damage.

Where appropriate, we may notify Members about legal requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon WanderJaunt's property, its Members and the WanderJaunt Platform. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that Member about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

3.3 Service Providers.

WanderJaunt uses a variety of third party service providers to help us provide services related to the WanderJaunt Platform. For example, service providers may help us: (i) verify your identity or authenticate your identification documents, (ii) check information against public databases, (iii) conduct background or police checks, fraud prevention, and risk assessment, (iv) perform product development, maintenance and debugging, (v) allow the provision of the WanderJaunt services through third party platforms and software tools (e.g. through the integration with our APIs), or (vi) provide customer service, advertising, or payments services. WanderJaunt and will need to share your information, including personal information, in order to ensure the adequate performance of our contract with you.

3.4 Social Media Platforms.

Where permissible according to applicable law we may use certain limited personal information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, to generate leads, drive traffic to our websites or otherwise promote our products and services or the WanderJaunt Platform. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest.

The social media platforms with which we may share your personal data are not controlled or supervised by WanderJaunt. Therefore, any questions regarding how your social media platform service provider processes your personal data should be directed to such provider.

3.5 Collection and Remittance of Occupancy Taxes.

In jurisdictions where WanderJaunt facilitates the Collection and Remittance of Occupancy Taxes as described in the Terms of Service (<https://wanderjaunt.com/terms-of-service>), you, where legally permissible according to applicable law, expressly grant us permission, without further notice, to disclose personal data and other information relating to your transactions, bookings, Accommodations and Occupancy Taxes to the relevant tax authority, including, but not limited to, the full name, Listing addresses, transaction dates and amounts, tax identification number(s), the amount of taxes received (or due), and contact information.

3.6 Government Registration.

In jurisdictions where WanderJaunt facilitates or requires a registration, notification, permit, or license application of a Homeowner with a local governmental authority through the WanderJaunt Platform in accordance with local law, we may share information of participating Homeowners with the relevant authority, both during the

application process and, if applicable, periodically thereafter, such as the Homeowner's full name and contact details, Accommodation address, tax identification number, Listing details, and number of nights booked.

3.7 Business Transfers.

If WanderJaunt undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence).

3.8 Aggregated Data.

We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

4. OTHER IMPORTANT INFORMATION

4.1 Analyzing your Communications.

We may review, scan, or analyze your communications on the WanderJaunt Platform for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyze messages to mask contact information and references to other websites. In some cases, we may also scan, review, or analyze messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible. However, occasionally we may need to manually review some communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyze your communications to send third party marketing messages to you, and we will not sell reviews or analyses of these communications.

These activities are carried out based on WanderJaunt's legitimate interest in ensuring compliance with applicable laws and our Terms of Service, preventing fraud, promoting safety, and improving and ensuring the adequate performance of our services.

4.2 Linking Third Party Accounts.

You may link your WanderJaunt Account with your account at a third party social networking service. Your contacts on these third party services are referred to as "Friends." When you create this link:

- some of the information you provide to us from the linking of your accounts may be published on your WanderJaunt Account profile;
- your activities on the WanderJaunt Platform may be displayed to your Friends on the WanderJaunt Platform and/or that third party site;
- the information you provide to us from the linking of your accounts may be stored, processed and transmitted for fraud prevention and risk assessment purposes; and
- the publication and display of information that you provide to WanderJaunt through this linkage is subject to your settings and authorizations on the WanderJaunt Platform and the third party site.

We only collect your information from linked third party accounts to the extent necessary to ensure the adequate performance of our contract with you, or to ensure that we comply with applicable laws, or with your consent.

4.3 Google Maps/Earth.

Parts of the WanderJaunt Platform use Google Maps/Earth services, including the Google Maps API(s). Use of Google Maps/Earth is subject to [Google Maps/Earth Additional Terms of Use](#) and the [Google Privacy Policy](#).

5. THIRD PARTY PARTNERS & INTEGRATIONS

The WanderJaunt Platform may contain links to third party websites or services, such as third party integrations, co-branded services, or third party-branded services (“**Third Party Partners**”). WanderJaunt doesn’t own or control these Third Party Partners and when you interact with them, you may be providing information directly to the Third Party Partner, WanderJaunt, or both. These Third Party Partners will have their own rules about the collection, use, and disclosure of information. We encourage you to review the privacy policies of the other websites you visit.

6. YOUR RIGHTS

You may exercise any of the rights described in this section by using the contact information in Section 10. Please note that we may ask you to verify your identity before taking further action on your request.

6.1 Managing Your Information.

You may access and update some of your information through your Account settings. If you have chosen to connect your WanderJaunt Account to a third-party application, like Facebook or Google, you can change your settings and remove permission for the app by changing your Account settings. You are responsible for keeping your personal information up-to-date.

- 6.1.1 All Members may review, update, correct or delete the personal data in your Account (including any imported contacts) by contacting us, or by editing your profile via the WanderJaunt Platform. If you completely delete all of your personal data, then your Account may become deactivated. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.
- 6.1.2 You may access, correct, amend, or delete your Member Content by accessing your Account (including any imported contacts). You control all Member Content you upload. Member Content that you delete (including Member Content containing personal information) may be retained in archived or backup copies in order to enable you to use certain features of the WanderJaunt Platform. For instructions on how to permanently delete Member Content from your account, please contact using the information in Section 10. Please note that permanent deletion of your Member Content through this process will impair or disable those features with respect to that Member Content.
- 6.1.3 You may access, correct, amend, or delete personal data we have about you by logging into your Account and navigating to your Account page. If you wish to cancel your Account, you may do so through your Account page. If you do, personally identifiable information associated with your Account will be deleted as soon as is reasonably practical or as required by applicable law. Please note that we may retain information that is otherwise deleted in anonymized and aggregated form, in archived or backup copies as required pursuant to records retention obligations, or otherwise as required by law.

6.2 Rectification of Inaccurate or Incomplete Information.

You have the right to ask us to correct inaccurate or incomplete personal information concerning you (and which you cannot update yourself within your WanderJaunt Account).

6.3 Data Access and Portability.

In some jurisdictions, applicable law may entitle you to request copies of your personal information held by us. You may also be entitled to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible). If you are a California resident, California law permits you to request certain information regarding the disclosure of your personal information by us and our related companies to third parties for the third parties' direct marketing purposes. To make such a request, please use the contact information in Section 10 below.

6.4 Data Retention and Erasure.

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. We will honor any legal right that you have to access, modify or erase your personal information. To request access and to find out whether any fees may apply, if permitted by applicable state, federal, or national law (outside of the United States), please use the contact information in Section 9 below.

6.4 Opting Out.

We will contact you from time to time for marketing purposes. Unless you have opted out, this could include contacting you by phone or email.

You may opt-out of receiving marketing communications from us by the following means:

1. Contact us using the information in Section 10;
2. Follow the instructions included in each communication or newsletter; or
3. Use the "unsubscribe" function.

Please remember that if you change your preferences it may take a short time for those preferences to become effective.

7. SECURITY

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, and information access controls. If you know or have reason to believe that your WanderJaunt Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your WanderJaunt account, please contact us following the instructions in the Contact Us section below.

8. CHANGES TO THIS PRIVACY POLICY

WanderJaunt reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the WanderJaunt Platform and update the "Last Updated" date at the top of this Privacy Policy. We will also provide you with notice of the modification by email at least thirty (30) days before the date they become effective. If you disagree with the revised Privacy Policy, you may cancel your Account. If you do not cancel your Account before the date the revised

Privacy Policy becomes effective, your continued access to or use of the WanderJaunt Platform will be subject to the revised Privacy Policy.

9. DMCA NOTICE

If you own a copyright or have authority to act on behalf of a copyright owner and want to report a claim that a third party is infringing that material on or through the WanderJaunt Platform, please send a notice to our copyright agent that includes all of the items below and we will expeditiously take appropriate action. Our designated copyright agent to receive such claims can be reached using the information in Section 10. This process does not limit our ability to pursue any other remedies we may have to address suspected infringement.

1. A description of the copyrighted work that you claim is being infringed;
2. A description of the material you claim is infringing and that you want removed or access to which you want disabled and the URL or other location of that material;
3. Your address, telephone number, and email address;
4. The following statement: "I have a good faith belief that the use of the copyrighted material I am complaining of is not authorized by the copyright owner, its agent, or the law (e.g., as a fair use)";
5. The following statement: "The information in this notice is accurate and, under penalty of perjury, I am the owner, or authorized to act on behalf of the owner, of the copyright or of an exclusive right that is allegedly infringed"; and
6. An electronic or physical signature of the owner of the copyright or a person authorized to act on the owner's behalf.

9. Your California Privacy Rights. If you are a California resident, you have the right to request information from us regarding the manner in which we share certain categories of your personal information with third parties for the third parties' direct marketing purposes. California law provides that you have the right to submit a request to us at our designated address and receive the following information: (a) the categories of information we disclosed to third parties for the third parties' direct marketing purposes during the preceding calendar year; and (b) the names and addresses of third parties that received such information, or if the nature of their business cannot be determined from the name, then examples of the products or services marketed. You are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. You may make such a request by using the contact information in Paragraph 1 above.

10. CONTACT US

If you have any questions or complaints about this Privacy Policy or WanderJaunt's information handling practices, you may email (hello@wanderjaunt.com) us.