

Privacy Statement

Vipio

25 February 2020

Vipio is *the* platform for unique stays and holidays. You can access our platform through our website www.vipio.com ("the Website"), and easily book or offer special accommodation. When you offer accommodation on our platform, we process your personal data. This Privacy Statement informs you how we handle your personal data.

Contact details

Vipio B.V. ("Vipio", "we", "us" or "our") is responsible for processing your personal data and has its registered office at Vaart Z.Z. 1D, 9401 GE in Assen, listed in the Trade Register of the Chamber of Commerce under number 74174789. If you have any questions about the processing of your personal data, please contact us at info@vipio.com.

Range of application

This Privacy Statement applies to you when you use our Website. Through our Website, you can offer or book packages, contact us, subscribe to our newsletter and apply for a job with us, among other things.

Purposes and grounds for processing

We use your personal data for various purposes. We may only do so if we have a reason (also called grounds) to . Below we explain which data we collect for which purpose and on which grounds (examples of grounds are: your consent, the conclusion/execution of a contract, our legitimate interest or the execution of a legal obligation).

1. Visiting the Website. When you visit the Website, we collect several technical details about your visit. For example, we collect the date and time of your visit, IP address, MAC address or any other unique number, browser, sections you visit, and other log information (such as a URL referrer). These personal data are necessary to allow the Website to function optimally and to display information in the desired manner. The processing of these personal data is thus necessary to protect our legitimate interests. We also collect information about your visit to our Website via cookies. Please refer to our [Cookie Statement](#) for more information about the cookies we place and their purpose.

2. Newsletter. We would like to keep you informed about our services and news. If you have registered or created an account, we will send you newsletters. In addition to your email address, we also use the information we receive through the tracking software. This includes the time the email is received and opened, the content of the opened email, the hyperlinks clicked on, your IP address, the operating system, and the browser you use.

If you have created an account, we process your email address to protect our legitimate interests. If you have not created an account, we will process your email address on the grounds of your consent.

We process the personal data we obtain through the tracking software to optimise and personalise our emails. We process these personal data to protect our legitimate interests.

3. Creating and using an account.
 - a. Creating an account. You can create an account on the Website. We will then register your email address and the password you provided. To book or offer special accommodation, we also require your name and address and telephone number. We also process data on the trade identity of the provider, which in some cases can be traced back to natural persons, such as the VAT identification number.
 - b. Booking a package (user). Through Vipio, you can book a package from our permanent offers or via auction. To bid on an auction, we ask that you confirm by phone verification that a bid is indeed being placed from your account. We then process your telephone number and the verification code you entered. When a package is booked, or an auction is won, we process name and address details, email address, telephone number, type of package (auction/permanent offers), date and time when the booking was made, check-in date (if established) or the period in which the voucher must be redeemed, price or bid amount, and the location of the package. In the event of a cancellation, we record the date, time and amount returned. The package owner then has access to this personal data when the booked package and/or the auction won is paid. When bidding at an auction, the owner and other users have access to an automatically generated bid number.
 - c. Booking a package (owner). Personal data of (employees of) the package owner may also be processed. These data are the same as those mentioned under b) plus the commission to be paid. When offering packages, we also ask you to confirm your

identity using telephone verification. After booking or winning an auction, the user is given access to the owner's commercial identity, namely its name, address and telephone number.

The above personal data are necessary for executing the user or owner agreement. Without this personal data, an account cannot be created, and no arrangements can be offered or booked.

4. Personalised offers. We use personal data to email relevant offers or to tailor (the stays offered on) the Website to visitors and users. We personalise these stays based on your website activity and the resulting interests, any purchase and/or sales data and the data you have entered on your account page, giving us insight into your browsing, searching and purchasing behaviour. We base the processing on the protection of our legitimate interests. This interest consists of making you personalised offers and adapting the content of the Website to your preferences (direct marketing).
5. Security and fraud prevention. We secure our systems and data and protect our company assets. We also do our best to keep our platform secure and to prevent fraud, for example, by checking whether bids are serious. We use your personal data for this purpose, including the date and time of the visit, IP address, MAC address or any other unique number, browser, parts of the Website that you visit and additional log information as well as the data that we have collected in the context of your account and associated purchasing and/or sales activities. The processing of these personal data is necessary to protect the legitimate interests of Vipio, namely to be able to offer the Website and the platform safely and reliably.
6. Payments. Payments are made through third-party service providers engaged by Vipio. To make the payment, you will be automatically redirected to the secure environment of your chosen payment provider. You will automatically be redirected to Vipio's platform if the payment has been successful or if the payment cannot be made. These payment providers are responsible for processing your personal data. We advise you to read the Privacy Statement of these service providers.
7. How to apply. Our Website regularly features vacancies for jobs or traineeships. When you respond to a vacancy, we process your name, email address, and information from your CV and/or cover letter (references, grade lists, certificates, etc.). We also consult (business) social media, such as LinkedIn and Facebook. The personal data we collect in the first phase of the application process is necessary to determine whether you would be suitable for the position. Therefore, the data are necessary to serve our legitimate interests.

8. Contacting us. If you contact us, we process personal data that you fill in or provide to us (by telephone), such as your name, email address, telephone number, any company data and the content of your question or complaint. We use this personal data to ensure that we can answer your questions. We, therefore, have a legitimate interest in this processing.
9. Other processing. We process personal data if supervisory bodies and inspectorates such as the Tax Authorities or the Personal Data Authority oblige us to do so.

Retention period for personal data

Vipio applies the following retention periods.

1. Website: We retain the personal data listed under 'visit to the Website' for 1 month after the visit. Please refer to the [Cookie Statement](#) for the retention periods we apply to the placement of cookies.
2. Newsletter: We keep the personal data we obtain through tracking software in the emails mentioned under 'newsletter' for 1 month after receiving them. The email address and the data to prove that you are allowed to send an email (such as your consent) are stored for a longer period, as indicated below.
3. Account data: The personal data listed under 'Creating and using an account' will be kept for one year after closing the account.
4. Job application: We will retain the personal data listed under 'job application' for 1 month after completion of the application unless you have been hired.
5. Contact: The personal data mentioned under 'contact' are kept for 1 month after the question has been answered or for 1 year after the complaint has been resolved.

Specific laws and/or regulations require us to store certain personal data for a longer period. For example, we have to store the email address and the data with which we can prove that we are allowed to email you personally (under the customer relationship or based on your permission) for 5 years after unsubscribing. For example, the Tax Authorities require us to store certain administrative information for at least 7 years. So even if you delete your account, we will still store your purchase details, among other things. We also store personal data for a longer period in the event of claims.

Access to personal data

The following third parties may access your personal data.

1. Owners and users of Vipio. As described under 'Purposes and grounds for processing', we share users' personal data with providers and vice versa.

2. We engage parties that process personal data on our behalf (Processors), for example, to host the Website, store and manage personal data and send newsletters.
3. Other third parties. Vipio shares personal data with parties that qualify (in part) as data controllers. This is the case, for example, for payments made through our Website by third-party service providers and to collect outstanding debts. As our cooperation partners are (partly) responsible for the processing of your personal data, they must inform you of this themselves.
4. Authorities and legal counsel. We may also share personal data with third parties, including supervisory bodies, tax authorities, investigative bodies and legal counsel. We will only do this if we are obliged to do so or if it is necessary to protect our interests (for example, in a court case).

Processing outside the European Economic Area Vipio may process personal data (have it processed) outside the European Economic Area.

For example, through our Website, you can go to our Facebook or Instagram page. These parties process personal data worldwide. We also use cloud services for web hosting and email software to send newsletters.

To comply with EU legislation on international transfers, these parties are certified under the EU-US Privacy Shield and the Swiss-US Privacy Shield. In addition, they may use model contractual clauses or adequacy decisions adopted by the European Commission.

Rights concerning personal data

The Privacy Act provides you with several privacy rights. If you wish to exercise these rights, you can submit a request to us at info@vipio.com.

1. The right to access. This is the right to ask us whether we have any personal data relating to you and to have access to those data.
2. The right to rectification. You can ask us to amend incorrect or incomplete personal data.
3. The right to be forgotten. In some cases, you have the right to have your personal data deleted by Vipio.
4. The right to restriction. This is the right to have less personal data processed or temporarily stop the processing of your personal data.

5. The right to data portability. This is the right to receive your personal data from us so that you can transfer them to another party.
6. The right to object. You can object to the processing of your personal data. If your personal data are processed for direct marketing purposes (see under 'purposes and grounds for processing'), you may always object to the processing of your personal data.
7. Withdrawal of consent. If you have given us permission to process your personal data, you may withdraw that permission at any time. This withdrawal will not affect the processing of your personal data prior to the withdrawal of consent.

We are not always obliged to grant your request(s). However, we will always respond to your request, and in any event, within one month. Only in special cases may we take longer, but we will be in touch within one month.

Complaints or questions

If you have any questions or complaints, for example, about our considerations for basing data processing on the 'legitimate interest' principle, you can contact us at info@vipio.com. We prefer to resolve the matter together with you, but you also have the right to lodge a complaint with the Dutch Data Protection Authority via [this link](#).

Amendments

We may amend this Privacy Statement. We will inform you about important substantive amendments.

Last update: 25 February 2020