

# Privacy Policy

Reservify (hereinafter called “–Reservify”, “we”, “our” or “us”) provides an end-to-end guest experience management platform (the “Reservify Platform”) designed to help hoteliers and hospitality experts digitize their guest journey, increase profitability, improve performance and offer an elevated guest experience.

This Privacy Policy describes how we collect, store, use and disclose personal data or personal information which relates to (i) our business customers which include real estate owners, property managers, hoteliers, hostel managers and other hospitality providers interested in sub-leasing of their property/properties (“Customer(s)”), (ii) third-party suppliers registered to the Reservify Marketplace or independently inputted to Reservify Platform by the Customer to provide ancillary services to the Customer’s Guests (as defined below) via the Reservify Platform (“Customer Service Provider(s)”), (iii) Authorized Users of the Reservify Platform on behalf of our Customers and the Customer Service Providers (collectively, “User(s)”), (iv) visitors of our website who visit the website, and any other prospective customers, users or partners (collectively, “Prospect(s)”) who visit or otherwise interact with our Site, online ads and content, emails, integrations or communications under our control (the “Site”, and together with the Platform, the “Services”).

This Privacy Policy describes Reservify’s independent privacy and data processing practices as a “Data Controller” and does not cover our privacy practices with respect to the processing of the personal data of individuals who manage their reservation with our Customers via the Customers’ interface at the Reservify Platform and who may purchase services from Customer Service providers

via the Reservify Marketplace (“Guest(s)”). We collect, process and manage such data solely on behalf and under the instructions of our Customers or the Customer Service Providers, as relevant, in our capacity as a “Data Processor” in accordance with our Data Processing Addendum with them. If you are a Guest, please contact the property owner/property manager/hotelier with which you made your reservation and that is the “Data Controller” of your Personal data, for any questions or requests regarding the processing of your Personal data.

Specifically, this Privacy Policy describes our practices regarding –

- Data Collection & Processing
- Data Uses & Lawful Bases
- Data Location and Retention
- Data Disclosure
- Cookies and Tracking Technologies
- Communications
- Data Security
- Data Subject Rights
- Data Controller/Processor
- Requirements under US State Privacy Laws
- Additional Notices

If you are a Customer, a Customer Service Provider, a User, a or a Prospect, please read this Privacy Policy carefully and make sure that you fully understand it.

You are not legally required to provide us with any of your personal data, and may do so (or avoid doing so) at your own free will. If you do not wish to provide us with your personal data, or to have it processed by us or any of our Service Providers (defined below), please refrain from interacting with our Site or from using our Services.

## 1. Data Collection & Processing

When we use the terms “personal data” or “personal information” in this Privacy Policy, we mean information that identifies, relates

to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual. It does not include aggregated or anonymized information that is maintained in a form that is not reasonably capable of being associated with or linked to an individual.

We collect or generate the following categories of personal data in relation to the Services:

- User Account data: personal data collected for your registration to the Platform, including full name, contact information and password.
- Business Details Information including contact details, position and workplace, contractual and billing details, which may also contain the details of internal focal persons who directly engage with us, e.g., billing contacts and authorized signatories on behalf of the Customer or Customer Service Provider; as well as details concerning their needs and preferences relevant to our existing engagement with them or potential engagement with our Prospects.
- Usage Information including connectivity, technical and aggregated usage data and activity logs, log-in and log-out time, IP addresses, device data (such as type, operating system, mobile device or ID, browser version, location and language settings used), cookies and pixels installed or utilized on the device, session recordings (clicks, use of features, logged activities and other interactions) and analytics, in connection with our Services.
- Direct interactions and communications with us: personal data contained in any forms and inquiries that you may submit to us, including emails, and chats with us, recordings and transcripts of your calls (e.g., for customer service, feedback and support).
- We collect the above personal data either automatically, through your interaction with us or our Services; or through third party

services, social media, analytics tools, and other business initiatives.

## 2. Data Uses & Lawful Bases

We use personal data as necessary for the performance of our Services (“Performance of Contract”); to comply with our legal and contractual obligations (“Legal Obligations”); and to support our legitimate interests in maintaining and improving our Services, e.g. in understanding how our Services are used and how our campaigns are performing, and gaining insights which help us dedicate our resources and efforts more efficiently; in marketing, advertising and selling our Services to you and others; providing customer services and technical support; and protecting and securing our Users, Customers, Customer Service Providers, Prospects, ourselves and our Services (“Legitimate Interests”).

If you reside or are using the Services in a territory governed by privacy laws under which “consent” is the only or most appropriate legal basis for processing personal data as described in this Privacy Policy (either in general, based on the types of personal data you expect or elect to process or have processed by us or via the Services, or due to the nature of such processing) (“Consent”), your acceptance of our Terms and of this Privacy Policy will be deemed as your consent to the processing of your personal data for all purposes detailed in this Privacy Policy, unless applicable law requires a different form of consent. If you wish to revoke such consent, please contact us at [dpo@reservify.co](mailto:dpo@reservify.co).

Specifically, we use personal data for the following purposes (and in reliance on the legal bases for processing noted next to them, as appropriate):

## **Customers', Customer Service Providers', and Users' personal data**

- To facilitate, operate, enhance, and provide our Services; (Performance of Contract; Legitimate Interests)
- To provide our Customers, Customer Service Providers and Users with assistance and support, to test and monitor the Services, diagnose or fix technical issues (Performance of Contract; Legitimate Interests);
- To invoice and process payments (Performance of Contract);
- To personalize our Services, including by recognizing an individual and remembering their information when they return to our Services, and to provide further localization and personalization capabilities (Performance of Contract; Legitimate Interests);
- To provide Customers with personalized offers aimed to induce an increase in sales by the Customers from our list of Customer Service Providers operating in the area of their properties (Performance of Contract; Legitimate Interests); and
- To provide, improve and optimize the Artificial Intelligence features embedded in our Services (Performance of Contract; Legitimate Interests).

## **Customers', Customer Service Providers', Users' and Prospects' personal data**

- To gain a better understanding on how Users and Prospects evaluate, use, and interact with our Services, to utilize such information to continuously improve our Services, the overall performance, user-experience and value generated therefrom. We collect such information automatically through their usage of the Services (Legitimate Interests);
- To create aggregated, statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or others may use to provide and improve our respective Services, or for any other business purpose such as business intelligence (Legitimate Interests);

- To facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver advertisements for our Services more effectively. Such activities allow us to highlight the benefits of using our Services, and thereby to increase your engagement and overall satisfaction with our Services. This includes contextual, behavioral and interests-based advertising the activity on our Services, preferences or other data available to us or to our Authorized Service Providers (as defined in Section 4 below) (Legitimate Interests);
- To contact our Customers, Customer Service Providers, Users and Prospects with general or personalized service-related messages, as well as promotional messages that may be of specific interest to them (Performance of Contract; Legitimate Interests; Consent);
- To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity (Performance of Contract; Legitimate Interests; Legal Obligations);
- To publish your feedback and submissions to our Sites (Legitimate Interests);
- To comply with our contractual and legal obligations and requirements, and maintain our compliance with applicable laws, regulations and standards (Performance of Contract; Legitimate Interests; Legal Obligations); and
- For any other lawful purpose, or other purpose that you consent to in connection with provisioning our Services (Legal Obligations; Consent).

### 3. Data Location & Retention

**Data Location:** We and our Authorized Service Providers (defined below) maintain, store and process personal data in Israel, the

United States, Europe and other locations as reasonably necessary for the proper performance and delivery of our Services, or as may be required by applicable law.

Reservify is headquartered in Poland, a jurisdiction which is considered by the European Commission. We transfer data from the all devices to Poland EU on this basis.

While privacy laws vary between jurisdictions, Reservify, and its Authorized Service Providers are each committed to protect personal data in accordance with this Privacy Policy, customary and reasonable industry standards, and such appropriate lawful mechanisms and contractual terms requiring adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction to which such data is transferred. You can obtain a copy of these clauses by contacting us as indicated in Section 11 below.

**Data Retention:** We may retain your personal data for as long as it is reasonably needed in order to maintain and expand our relationship and provide you with our Services and offerings; in order to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (i.e. as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our data retention policy and at our reasonable discretion. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of such data, the potential risk of harm from unauthorized use or disclosure of such data, the purposes for which we process it, and the applicable legal requirements. If you have any questions about our data retention policy, please contact us by email at [dpo@reservify.co](mailto:dpo@reservify.co).

#### **4. Data Disclosure**

We disclose personal data in the following ways:

**Our Customers and Customer Service Providers:** Our Customers and Customer Service Providers have access to any information regarding the Guests' reservation or purchase of services with them, that we process on their behalf.

**Our Authorized Service Providers:** We may engage selected third-party companies and individuals to perform services on our behalf or complementary to our own. Such service providers include hosting services, data security services, billing and payment processing services, fraud detection and prevention services, web and product analytics, e-mail distribution and monitoring services, session or activity recording services, remote access services, performance measurement, data optimization and marketing services, social and advertising networks, voicemails, support, enablement and customer relation management systems, and our legal, financial and compliance advisors (collectively, "Authorized Service Providers"). Our Authorized Service Providers may have access to personal information, depending on each of their specific roles and purposes in facilitating and enhancing our Services, and may only use the data as determined in our agreements with them.

**Partnerships:** We engage selected business partners which allow us to explore and pursue growth opportunities. In such instances, we may share relevant contact, business and usage details with the respective partner, to allow them to engage with those entities and individuals for such purposes. If you directly engage with any of our partners, please note that any aspect of that engagement which is not directly related to the Services and directed by Reservify is beyond the scope of Reservify's Terms and this Privacy Policy, and may therefore be covered by the partner's terms and privacy policy.



**Service Integrations:** You may choose to use third-party services to integrate with our Services, such as Property Management systems and Channel Manager software, payment providers, booking software for tour & activity operators (provided that such integration is supported by our Services). The provider of this integrated third-party service may receive certain relevant data (that may include personal data) about or from your account on the Services, or share certain relevant data from your account on the third-party provider's service with our Services, depending on the nature and purpose of such integration. Note that we do not receive or store your passwords for any of these third-party services (but do typically require your API key to integrate with them).

**Legal Compliance:** We may disclose or allow government and law enforcement officials access to your personal data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our products and services.

**Protecting Rights and Safety:** We may share personal data with others if we believe in good faith that this will help protect the rights, property or personal safety of Reservify, any of our Customers, Customer Service Providers, Users, Guests or Prospects, or any members of the general public.

For the avoidance of doubt, Reservify may share personal data in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal, non-identifiable and anonymous. We may transfer, share or otherwise use non-personal and non-identifiable data at our sole discretion and without the need for further approval.

## **5. Cookies and Tracking Technologies**

Our Services (including some of our Authorized Service Providers) utilize “cookies”, anonymous identifiers, pixels, container tags and other technologies in order for us to provide and monitor the use of our Services and Sites, to ensure that they perform properly, to analyze our performance and marketing activities, and to personalize your experience. Such cookies and similar files or tags may also be temporarily placed on your device. Certain cookies and other technologies serve to recall personal data, such as an IP address. To learn more about our practices concerning cookies and tracking, please see our Cookie and Tracking Policy. You may opt-in or opt-out to the use of non-essential cookies through the cookie banner on our website by clicking on the “Customize” button in the cookie banner, and at any time by opening the “Cookie Setting” widget always available on the website. You can also manage your cookies preferences, and accept, remove or entirely block cookies, through your browser settings. If you choose to opt-out of certain cookies, this will typically generate a new cookie which will preserve your choice, and indicate it to our Services in your next visits so that the cookies you opted-out of will not be utilized.

Certain web browsers may transmit “Do Not Track” signals to websites with which the browser communicates. However, due to differences in how web browsers interpret this feature and send those signals, and lack of standardization, we do not change our practices in response to such “Do Not Track” signals.

## **6. Communications**

We engage in Services and promotional communications, through email and phone.

**Services Communications:** We may contact you with important information regarding our Services. For example, we may send you notifications (through any of the means available to us) of changes or updates to our Services, billing issues, log-in attempts or password reset notices, etc.

**Promotional Communications:** We may also notify you about new features, additional offerings, and special opportunities or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g. phone, mobile or email), through the Services, or through our marketing campaigns on any other sites or platforms. If you do not wish to receive such promotional communications, you may notify us at any time by sending an email to [dpo@reservify.co](mailto:dpo@reservify.co), or by following the instructions contained in the promotional communications you receive.

## **7. Data Security**

In order to protect your personal data held with us, we use industry-standard physical, procedural and technical security measures, including encryption as appropriate. However, please be aware that regardless of any security measures used, we cannot and do not guarantee the absolute protection and security of any personal data stored with us or with any third parties as described in Section 4 above. To learn more, please visit our Security Center.

If you have reason to believe your password has been stolen or compromised, please contact us as soon as possible at: [dpo@reservify.co](mailto:dpo@reservify.co), so we may suspend your account and assist you in renewing your password.

## **8. Data Subject Rights**

Individuals have rights concerning their personal data. Please contact us by e-mail at [dpo@Reservify.co](mailto:dpo@Reservify.co) if you wish to exercise your privacy rights under any data protection law applicable to you, including the EU General Data Protection Regulation (GDPR), or US States privacy laws (including the California Consumer Privacy Act

(CCPA)). Such rights may include – the right to know/request access to (specific pieces of personal data collected; categories of personal data collected; categories of sources from whom the personal data was collected; purpose of collecting personal data; categories of third parties with whom we have shared personal data), to request rectification or erasure of your personal data held with Reservify or to restrict or object to such personal data processing (including under certain US State privacy laws the right to direct us not to “sell” or “share” (as such terms are defined under applicable laws such as the CCPA), or to port such personal data, or the right to equal services and prices (e.g. freedom from discrimination). If you are a GDPR-protected individual, you also have the right to lodge a complaint with the relevant supervisory authority in the EU or the UK, as applicable.

If your request relates to personal data that we process as “Data Processor” on behalf of our Customer or a Customer Service Provider (as further detailed in Section 9) who are the “Data Controllers” of such personal data and are exclusively responsible for fulfilling your request – Please submit your request directly to them.

Please note that when you ask us to exercise any of your rights under this Privacy Policy or applicable law, we may need to ask you to provide us certain information to verify your identity, in order to avoid disclosure to you of personal data related to others and to ask you to provide further information to better understand the nature and scope of data that you request to access. We will not fulfill your request unless you have provided sufficient information that enables us to reasonably verify that you are the individual about whom we collected the personal data, or that such data is processed on behalf of one of our Customer or a Customer Service Provider, so that we may forward it to such Customer or Customer Service Provider as relevant, for their further handling. Such additional information may be then retained by us for legal purposes (e.g., as proof of the identity of the person submitting the request, or proof of request fulfillment).

We may redact from the data which we will make available to you, any personal data or confidential information related to others.

## **9. Data Controller/Processor**

Certain data protection laws and regulations, such as the GDPR or the CCPA, typically distinguish between two main roles for parties processing personal data: the “Data Controller” (or under the CCPA, “business”), who determines the purposes and means of processing; and the “Data Processor” (or under the CCPA, “service provider”), who processes such data on behalf of the Data Controller (or business). Below we explain how these roles apply to our Services, to the extent that such laws and regulations apply.

Codahead sp. z o.o. sp. k. is the Data Controller of our Customers’, Customer Service Providers’, Users’ and Prospects’ personal data, as detailed in Section 1 above. Accordingly, we assume the responsibilities of a Data Controller (solely to the extent applicable under law), as set forth in this Privacy Policy.

Codahead sp. z o.o. sp. k. is the Data Processor of the Guests’ personal data (including reservation information such as dates of stay, reserved property, amount paid, purchase of additional services offered by Customer Service Providers, or any other information provided through the Customers’ interface), and the communications between the Customers’ or Customer Service Providers’ Users and the Guests through the Services, that we process on their behalf.

Our Customers and Customer Service Providers are the Data Controllers (or businesses) of personal data of the Guests who booked a reservation or purchased a service with them. Codahead sp. z o.o. sp. k. processes such personal data in accordance with our Customers’ or Customer Service Providers’ instructions, subject to our Terms, and data processing addendum and other

commercial agreements with them. As the Data Controllers, the Customers and Customer Service Providers are solely responsible for meeting any legal requirements applicable to data controllers, including for establishing an appropriate legal basis for processing and providing adequate notice to the Guests, and any other information necessary to comply with all applicable privacy and data protection laws; to obtain all approvals and consents from such individuals as required under such laws; and to handle data subject rights requests under applicable law coming from their Guests and any other individuals whose data are processed on their behalf through the Services.

Therefore, if you would like to make any requests or queries regarding Guests' personal data, including accessing, correcting or deleting your data, please contact the relevant Customers or Customer Service Providers directly.

## **10. Requirements under US State Privacy Laws**

This Privacy Policy describes the categories of personal information we may collect and the sources of such information (in Section 1 above), and our retention (Section 3) and deletion (Section 8) practices. We also included information about how we may process your information (in Sections 1 through 7), which includes "business purposes" under the CCPA and similar US State Privacy Laws, as applicable. If you would like to opt-out of the "sale" or "sharing" (as such terms are defined in the CCPA or applicable US State Privacy Laws) of your personal information, please contact [dpo@Reservify.co](mailto:dpo@Reservify.co). We may disclose personal data to third parties or allow them to collect personal data from our Services as described in Sections 4 and 5 above, if those third parties are our Customers (in respect of Guests' personal data processed on their behalf), Customer Service Providers, or our Authorized Service Providers who have agreed to our contractual limitations as to their retention, use, and disclosure of such personal data, or if you integrate the Services of third parties with our Services, or direct us to disclose your personal data to third

parties, or as otherwise described in Section 4 above. You may also designate an authorized agent, in writing or through a power of attorney, to request to exercise your privacy rights on your behalf. The authorized agent may submit a request to exercise these rights by emailing us. We will not discriminate against you by withholding our Services from you or providing a lower quality of service to you for requesting to exercise your rights under the law.

If you have any questions or would like to exercise your rights under any applicable US State Privacy Laws, you can contact [dpo@reservify.co](mailto:dpo@reservify.co).

## **11. Additional Notices**

**Updates and Amendments:** We may update and amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the date it is published. When we make material changes to this Privacy Policy, we will give notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the Services or by sending an email. Your continued use of the Services after the changes have been implemented will constitute your acceptance of the changes.

**Third Party websites and services:** Our Services includes links to third party websites and services, and integrations with third party services. Such websites and third-party services, and any information you process, submit, transmit or otherwise use with or to such websites and services are governed by such third party's terms and privacy practices and policies, and not by this Privacy Policy. We encourage you to carefully read the terms and privacy policies of such websites and third-party services.

**Our Services is not directed to children:** Other than information we may collect on our Customers' Guests as part of the Services, we do not knowingly collect or process personal data relating to children and minors under the age of 18 years or less, according to

applicable local laws, unless we are legally obliged to do so. If we become aware that personal data was collected relating to children and minors under the age of 18 years (or stricter age limit applicable under the law of certain countries) without the informed consent of a parent or legal guardian, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any personal data stored with us with regard to such child, including where it is necessary to delete the account/username used by the minor. If you believe that we might have any such data, please contact us by email at [dpo@reservify.co](mailto:dpo@reservify.co).

DPO: Codahead sp. z o.o. sp. k. has appointed Data Controller for monitoring and advising on Reservify's ongoing privacy compliance and serving as a point of contact on privacy matters for data subjects and supervisory authorities. Our DPO may be reached at [dpo@reservify.co](mailto:dpo@reservify.co).

EU Representative: Reservify is being owned by Codahead sp. z o.o. sp. k. , polish company with the registration no. PL6793116863 , with the office at Smolki 5 in Cracow, Poland. Data protection matters related to the processing of personal data of residents of the EU, pursuant to Article 27 of the GDPR. If you have any comments or questions regarding our Privacy Policy, if you have any concerns regarding your privacy, or if you wish to make a complaint about how your personal data is being processed by Reservify/Codahead, please send an email to [dpo@Reservify.co](mailto:dpo@Reservify.co) or by post address above.

Questions, concerns or complaints: If you have any comments or questions regarding our privacy policy or practices, or if you have any concerns regarding your personal data held with us, or if you wish to make a complaint about how your personal data is being processed by Reservify, please contact Reservify's at [dpo@Reservify.co](mailto:dpo@Reservify.co).



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