



Your privacy at Belvilla - Privacy Statement for users of our App

In this privacy policy, you can read about which personal data we collect from you as a homeowner or user of our Website and App, how we handle this data, what your rights are and with which parties we collaborate. It is a major priority for us to ensure that our service is trustworthy and transparent. We handle your personal data with care and discretion, making sure that we adhere to all applicable legislation and regulations.

CONSENT TO INSTALLATION OF THE APP

Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data. This information is provided in this Privacy Policy and it is important that you read that information.

Before installation of this App, please indicate your consent to our processing of your personal data (including your name, contact details, financial and device information) as described in the Privacy Policy.

I consent to the installation of the App for the purposes of allowing you to review your Bookings and Pricing Structure, add/update Discounts, look into Guest Reviews, approve/deny Booking Requests and take actions towards Revenue Management.

How you can withdraw consent

Once you provide consent by selecting "YES", you may change your mind and withdraw consent at any time by contacting us bvownerappfeedbacksupport@oyorooms.com but that will not affect the lawfulness of any processing carried out before you withdraw your consent.

This privacy policy (together with our end-user licence agreement as set out at www.belvilla.com (**EULA**) and any additional terms of use incorporated by reference into the EULA, together our Terms of Use) applies to your use of:

- Belvilla Owner mobile application software (**App**) hosted on [Google PlayStore](#) and the [Apple App Store](#), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**).
- Any of the services accessible through the App (**Services**) that are available on the App Site or other sites of ours (**Services Sites**), unless the EULA states that a separate privacy policy applies to a particular Service, in which case that privacy policy only applies. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below:

1. IMPORTANT INFORMATION AND WHO WE ARE

2. HOW BELVILLA USES YOUR PERSONAL DATA

3. COOKIES

4. RETENTION PERIODS

5. THIRD PARTIES

6. SECURITY

7. YOUR RIGHTS WITH REGARDS TO YOUR PERSONAL DATA

8. CONTACTING BELVILLA

1. IMPORTANT INFORMATION AND WHO WE ARE

This is the privacy policy of Belvilla AG, the controller for the processing of your personal data for the Belvilla brand. The main processor of your personal data for the Belvilla brand is Belvilla Services B.V., a Dutch based sister company of Belvilla. Belvilla Services B.V. performs services such as marketing and customer support on behalf of Belvilla AG. Belvilla

AG will be referred to as 'Belvilla' in this privacy policy. Both Belvilla AG and Belvilla Services B.V. are part of the OYO Group.

We have appointed a data protection officer (DPO). If you have any questions about this privacy policy, please contact them using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Belvilla AG

Name or title of DPO: Eamonn Haughian

Email address: Eamonn.Haughian@Belvilla.com

Postal address: Flurstrasse 55, 8048 Zürich, Switzerland

You have the right to make a complaint at any time to the Federal Data Protection and Information Commissioner or other competent supervisory authority of an EU member state if the App is downloaded or website used outside of Switzerland.

2. HOW BELVILLA USES YOUR PERSONAL DATA

In this section, you will find information about the various purposes for which Belvilla processes your personal data, which personal data are involved, the legal basis for the use of this data and how long the data are stored.

2.1 Registering as an interested homeowner

Whenever you register via our Website and App as an interested homeowner, we ask you for information to determine whether the home is compatible with the services we provide. This information consists, among other things, of the location of the holiday home, the type of holiday home and the number of persons the home can accommodate. We will also ask for some contact details. This data consists of your name, e-mail address and telephone number. In the event that our contact does not ultimately result in a contract, we will delete this data after 2 years. In addition, an account will be created for you. We will use your e-mail address as a login for this purpose and you will then be able to create your own password. An account needs to be created in order to communicate the required data for your holiday home. You can manage your own account. Furthermore, you will receive multiple mailings from Belvilla. The purpose of these mailings will be to inform you of the next steps and to provide you with relevant information for renting out your holiday home.

2.2 Finalising and fulfilling a contract

If you sign a contract, we will ask for the additional details we need to rent out your holiday home and to fulfil the contract. These details consist of detailed information about your holiday

home and personal details. We keep your personal information to a minimum, but in addition to your name, email address, address and telephone number, we will require your bank details so that we can make payments to you. We also need to conform to existing legislation. If you rent out a holiday home in Spain via us, we are obliged to report your rental income, tax number or ID type and number to the certified Spanish authorities. We use this information solely for this purpose. We work together with various partners to rent out your holiday home. Examples of our partners are Booking.com and HomeAway. We supply information about your holiday home to these partners. We provide them with the details they need to display your holiday home on their website for the purposes of renting it out. However, your contract is solely with Belvilla, and the guests sign a contract directly with Belvilla. In certain cases, our partners need additional personal information (such as tax number) in order to rent out your holiday home. If this is the case, you will be asked whether you agree to the disclosure of these details. If you do not agree, your holiday home will no longer be displayed on these partners' website.

2.3 Creating a Belvilla account on our Website and App

Whenever you enter a contract with us, an account will be created for you. For this, we process your login name (e-mail address) and password. You can manage your account yourself. Via your account you can see various details, including information about your holiday home and any bookings made. It is necessary to create an account in order to manage and view bookings, i.e. for the execution of the contract between Belvilla and yourself. Belvilla retains the account data as long as you actively use your account. If you end your contract with Belvilla, we will delete your account details after 4 years. In accordance with statutory retention periods, Belvilla retains the personal data that we process in relation to your bookings and invoices for 7 years. We monitor your use of the Website and App by registering your number of logins. This enables us to execute the contract more effectively and optimise our Website and App.

2.4 Responding to questions or complaints

Questions about the bookings made with you, requests or other comments or complaints can be sent to us by e-mail or by contacting our Service Centre by phone. In that case, we use your personal data to handle your questions, to be able to get back in contact with you and to be able to undertake other necessary actions in response to your complaint or request. We maintain a record of which times and via which channels we have been in contact with you, the reasons for your contact and the relevant content of what was discussed or the emails that have been exchanged. This information is necessary to execute the agreement with you or is in Belvilla's legitimate interest to be able to provide you with better service. The details stored by the Customer Service Centre are retained for 7 years, or 4 years after the contract ends. If you have contacted us but not signed a contract with us, your details will be deleted after 2 years (see 2.1).

2.5 Data on visiting and using the Website and App

Whenever you visit our Website and App, various data are automatically registered on our server such as which web pages you visit, your IP address (a unique number that is automatically assigned to your computer by your internet service provider when you go online - the final digits are not saved, so your exact computer cannot be identified), the name of your computer operating system and the type of web browser you are using. We keep track of the number of logins to our Website and App so that we can check whether relevant information on the Website and App regarding the rental of your property reaches you. Data that are important to us in relation to the functionality of the Website and App, such as your login status, are stored for up to 1 year from your most recent visit to the Website and App or the most recent time you used your account. Data about your click behaviour and other data registered in relation to your visit to the Website and App are stored for 2 years. However, this data is never deleted from Google Analytics and Firebase, although it is impossible to link such data to individual users.

2.6 Marketing

Your booking information and our communication with you can be combined by Belvilla. All this information enables Belvilla to perform various forms of marketing, such as via e-mail (newsletter), (un)addressed post, telephone contact, and banners and advertisements on the Website and App, in order to make the information that is sent or displayed as relevant and interesting to you as possible. We measure the effectiveness of all our campaigns. You have the possibility of opting out of the commercial newsletter and/or indicating that you do not wish to receive commercial post from us. You can also object at any time to the use of your personal data for direct marketing purposes (see the section 'Contacting Belvilla' below to find out how to do this). We also send you regular service notifications via e-mail or post which enable you to rent out your home more effectively. Because these service notifications are part of the services we provide under our contract with you, you cannot opt out of receiving them.

2.7 Website and App maintenance and optimisation

Your personal data are also used to analyse the use of our Website and App and related technologies, to perform maintenance, to resolve any outages, to improve availability and to protect against fraud.

2.8 Guest reviews

After a stay in a holiday home rented from Belvilla, guests can post a review of your holiday home on our Website and App. This review is visible by all Website and App visitors. The

guest is asked to preferably post your full name, but in any event your first name and your place of residence with the review. You may react to but cannot delete the review. However, you may submit a request for deletion to Belvilla. Belvilla reserves the right to reject reviews at their discretion and without providing reasons. Reviews by guests may be shared with other brands of Belvilla and with partners who also let the holiday home in question. As a result these reviews may also be published on other websites and apps.

2.9 Uploading content

When you upload content (like photos or videos) onto the App or Website, you hereby grant to us a non-exclusive, royalty-free, transferable, sub-licensable, worldwide license to host, use and distribute the uploaded content. You can end this license anytime by deleting your content or account.

3. COOKIES

Much of the data mentioned in this privacy policy is collected by means of cookies. Cookies are small text files that your device or browser stores whenever you visit our Website and App. Belvilla also uses other techniques similar to cookies such as tracking pixels, Java scripts, tags and web beacons. If you return to our Website and App, your device or browser will be recognised. This is necessary to enable us to measure and analyse your use of our Website and App, among other things. Cookies are also used by us and by third parties to be able to display personalised advertisements to you. Whenever necessary, you will always be asked for consent to let us place these cookies. You can read more about Belvilla's use of cookies, including which cookies are installed, the purpose of the cookies, and the retention period, in our [Cookie Policy](#).

4. RETENTION PERIODS

We store your data for as long as necessary for the aforementioned purposes or in compliance with legal (data storage) requirements. This privacy policy lists the various storage periods adhered to by Belvilla. After the expiration of the storage period, we will delete or anonymise your personal data. After that, you will no longer receive information from Belvilla.

5. THIRD PARTIES

We will only share your personal data with third parties when necessary:

- In order to rent out your holiday home, we share the required property details with our partners, and in some cases the licence number and tax number or ID type and number;

- For the purposes of providing a service via this third party which we need in order to be able to rent out your holiday home, such as IT service providers, product suppliers, and service and other partners;
- If you rent out a holiday home in Spain via us, we are obliged under Spanish law to report the following information to the Spanish government: name, tax number or ID type and number, property details (land registry reference and address) and rental period and rental amount;
- For analysing data about your use of the Website and App and for personalising the Website and App and communications, such as Google;
- Belvilla also uses third parties to display relevant offers and advertisements. These are RTB House (retargeting), Criteo (retargeting), Facebook, Google and Mediahuizen (Ster/RTL/Branddeli). Belvilla only provides personal data to supervisory authorities, investigative services and fiscal authorities to the extent required by law. Most of these third parties are processors and use your personal data only for Belvilla's purposes. These parties are located in the Netherlands. Various IT providers are located outside the European Union or have access to personal data from outside the European Union. Belvilla only provides personal data to parties that guarantee that they have taken the required measures to adequately protect the data. With each processor, a processing contract is agreed to in which these third parties agree to non-disclosure and protection of your personal data, among other things. Insofar as parties (with access from) outside the EU are concerned and the country in which the party is located does not offer an adequate level of protection, Belvilla provides these parties with data only on the condition that they agree to a contract containing model provisions approved by the European Commission, or Belvilla ensures other appropriate measures are taken. Personal data is only disclosed to supervisory, investigative and tax authorities if Belvilla is under a legal obligation to do so.

6. SECURITY

Proper protection of your personal data is a major priority for Belvilla. Therefore, Belvilla has taken appropriate technical and organisational measures to protect your personal data against unauthorised or otherwise unwanted access. This is visible to you in various ways, including the small padlock symbol that appears in your browser when you are making a booking. Employees of Belvilla or third parties commissioned by Belvilla only have access to your personal data to the extent necessary to perform their tasks. In addition, we advise you to choose as safe a password as you can for the Belvilla account we have created for you, and to keep this password secret and change it regularly. We store your password in an encrypted form. We regularly perform automated security scans on our Website and App and take adequate measures to protect our systems against unauthorised access.

7. YOUR RIGHTS WITH REGARDS TO YOUR PERSONAL DATA

You have the right to view all your data as registered with Belvilla and to adjust it (or request for it be adjusted) if it is incorrect or incomplete. You must also update your information as saved in your account yourself if this information changes. Furthermore, you have the right to delete or restrict processing of your personal data by Belvilla under certain circumstances and the right to ask Belvilla to process your personal data to yourself or to a third party. If you wish, Belvilla can send you a written statement of your information. If you wish to no longer receive commercial e-mails, send a request to privacy@belvilla.com. If you also do not wish to receive post, you can send a written request via e-mail or post to Belvilla Services B.V. (Postbus 2051, 5600 CB, Eindhoven, the Netherlands). Once you have consented to let us place cookies that are used, among other things, for marketing purposes such as displaying personalised advertising, you can retract your consent via your browser settings (find out more information in our cookies policy). You can delete cookies that have already been placed. Please note that various functionalities of the Website and App will no longer work as well after that. Furthermore, you can object to our processing of your personal data on grounds related to your specific situation, specifically whenever these data are processed in the legitimate interest of Belvilla (as indicated in this privacy policy).

8. CONTACTING BELVILLA

To exercise your rights with regard to your personal data, you can contact us (Belvilla AG, Flurstrasse 55, 8048 Zürich or privacy@belvilla.com). You may be asked to submit a copy of your personal identification. For other questions about our use of your personal data, this privacy policy or other matters related to our services or the Website and App, you can also contact us with no obligation. Your question or comment will be handled confidentially and as quickly as possible by our qualified staff. In case you would like to make a complaint about Belvilla's handling of your personal data, you can always contact the Federal Data Protection and Information Commissioner in Switzerland. This privacy policy can be updated by Belvilla at any time. The updated privacy policy can be found on our Website and App with a clear indication that it is a new version. Insofar as we have access to your e-mail address, we will inform you by e-mail in case of any important changes. Last update: February 2020