

HOSTELSNAP PRIVACY POLICY

1. YOUR PRIVACY: OVERVIEW

This privacy policy (this "Privacy Policy") tells you about the information that Hostel Management International, LLC d/b/a HostelSnap ("HostelSnap," "we," "us" or "our") collects in connection with the operation of our website located at <http://www.hostelsnap.com> and all related account subdomains and online services offered by HostelSnap (collectively, the "Service"), how the information is used and how you can access and correct certain information that we may collect. This privacy policy also outlines your rights as a user and our responsibilities to comply with the European General Data Privacy Regulations (GDPR).

By using the Service, you consent to the collection and use of your personal information as described in this Privacy Policy. Please note that this Privacy Policy applies only to information collected from you by HostelSnap via the Service. It does not apply to information obtained or disclosed in offline correspondence or through other personal contacts with HostelSnap representatives. Further, the Service may contain links to other entities' websites that are not controlled or operated by HostelSnap. This Privacy Policy does not apply to such third-party websites, and HostelSnap is not responsible for the content of such third-party websites or the privacy practices of such third parties. Therefore, we encourage you to request and review the privacy policies of any third parties upon disclosing your information to such parties or visiting such third-party websites.

This Privacy Policy is effective as of May 24, 2018.

2. COLLECTION OF YOUR INFORMATION

You can access some areas of the Service without submitting any personally identifiable information. HostelSnap collects personally identifiable information only if you choose to complete any online forms for purchases, reservations, hostel check-in's, subscribe to newsletters, or to request information or assistance through the Service. The personally identifiable information that HostelSnap collects through these portions of the Service may include your name, email address, address and telephone number and any other personally identifiable information that you choose to include in your submissions to us or to our clients through their account subdomains. You represent and warrant that you have the right and authority to provide any information provided by you. HostelSnap may also collect certain non-personally identifiable information in connection with the operation of the Service, including IP addresses, browser or operating system information, data on advertisements or links on which you click, and the websites that you visit before or after you visit the Service. Such information is maintained by HostelSnap or service providers acting on behalf of others.

3. PROTECTION OF YOUR INFORMATION

To prevent unauthorized access or disclosure, maintain data accuracy and facilitate the appropriate use of information, HostelSnap uses physical, technological and administrative procedures to attempt to protect the personally identifiable information we collect through the Service. Nevertheless, Internet transmissions are never completely private or secure. You understand that any messages or information you send to the Service may be read or intercepted by others, and users of the Service may be able to view your information. If you have any questions about the security of personally identifiable information collected by HostelSnap, please contact us at: support@hostelsnap.com.

4. USE OF YOUR PERSONALLY IDENTIFIABLE INFORMATION

Upon our collection of your personally identifiable information, HostelSnap may use such personally identifiable information internally, separately or in combination with pre-existing information, for the following purposes:

- To provide any requested information, products or services;
- To enhance user experience;
- For internal aggregation purposes;
- To troubleshoot problems with the Service;
- To customize your experience on the Service;
- To enforce our **Terms of Service** or compliance with this Privacy Policy; or
- To contact you with more information about HostelSnap and its products or services;

Personally identifiable information collected on the Service may be stored and processed in the United States, Canada or abroad.

5. PRODUCTS, SERVICES AND CREDIT CARD PAYMENTS

The information you enter when making a purchase through the Service will be shared with payment processors, financial gateways, and your credit card company to authorize credit card payments. Such personally identifiable information may also be shared with necessary third parties solely for the purpose of carrying out the transactions and to investigate allegations of fraud. We may also utilize any number of third party payment processing companies to assist with the sales process, and you may be directed to their website in order to make purchases (see, Section 1)

6. DISCLOSURE OF YOUR INFORMATION

As a data processor providing software services, we serve hostels subscribing to our services. As a result, we are obligated to share your personally identifiable information with the hostel you have chosen to reserve or check-in at, however this disclosure will be in accordance with the Data Processing Agreement we have with the hostel and GDPR regulations. We encourage you to check the hostel's individual privacy policy for details of how they may use your data. A sample copy of our Data Processing Agreement can be found [here](#).

We may disclose your personally identifiable information to our subsidiaries or affiliates and to third party partners whom we occasionally hire to provide services on our behalf, including support services, website services, delivering promotional materials, answering customer questions about our services and new services. HostelSnap will only provide those third-party partners with the personally identifiable information they need to deliver the services to us and/or on our behalf, and they will be contractually prohibited from using that information for any other purpose. In the event that HostelSnap is involved in a transaction such as a merger, stock purchase or sale, or sale of substantially all of HostelSnap assets, your personal information may be transferred to the other party in such transaction.

HostelSnap reserves the right to disclose your personally identifiable information if required to do so by law or legal process or otherwise requested by any law enforcement officer or agency acting under color of law. In addition, HostelSnap reserves the right to disclose your personally identifiable

information based on the good faith belief that such action is necessary or appropriate to: (a) protect and defend the rights or property of HostelSnap, or (b) act in urgent circumstances to protect the safety or security of the public or of users of the HostelSnap products and the Service.

7. PROVISIONS RELATED TO USERS RESIDING IN EUROPE

HostelSnap complies with the provisions of the General Data Protection Regulation (“GDPR”) made effective in the EU on May 25, 2018, and will be pursuing certification under the EU and Swiss Privacy Shield protocols. HostelSnap is committed to protecting the security of your personal information, and we take commercially reasonable technical and organizational measures that are designed to that end. If you wish to opt out of any disclosures of your information to third parties or to prevent the use of your personal information for a purpose that is materially different from the purpose for which it was originally collected, you may contact us at support@hostelsnap.com and request to have your personal data removed. The use of your information can be limited, or the information can be corrected, deleted, or exported to you or a third-party of your choice, except as required by law as indicated above.

8. COOKIES

HostelSnap may also use cookies to gather information about your visits to the Service in order to enhance your experience. A cookie is a small string of information that the website you visit transfers to your computer for identification purposes. Cookies can be used to follow your activity on the Service and that information helps us to understand your preferences and improve your experience with the Service. Cookies are also used for such activities as remembering your username and password, if necessary. You can turn off all cookies, in case you prefer not to receive them. You can also have your computer warn you whenever cookies are being used. For both options you have to adjust your browser settings (such as Mozilla, Firefox, Chrome or Internet Explorer and Edge). There are also software products available that can manage cookies for you. Please be aware, however, that when you choose to reject cookies, this choice may limit or block the functionality of the Service.

9. WEBSITE ANALYTICS

HostelSnap may use third-party services to help analyze how you use our Service. These analytic services use cookies, (see, Section 7). The information generated by the cookie about your use of the Service is transmitted to the Service. This information is then used to evaluate various uses of the Service and to compile statistical reports on Service activity for us, and us alone. We will never (and will not allow any third party to) use these analytics service tools to track or to collect any of your personally identifiable information.

10. NO SPYWARE OR ADWARE

We do not install any spyware or adware in connection with our Service or distribute any commercial message, or authorize any third party to distribute any commercial message, by means of spyware or adware. "Spyware" or "adware" is any software which has been downloaded to or installed on an Internet user's computer or device, without the user's actual consent, and facilitates the distribution of any commercial message to the user. If you feel you may have spyware from another company installed on your machine or device, there are various anti-spyware/adware software applications available on the Internet to identify if this has occurred.

11. USER PROVIDED CONTENT

If you post any User Generated Content (as defined in the Terms of Service) you are solely responsible for the content of your messages. You should be aware that when you voluntarily disclose personally identifying Information (for example, your name, street address, email address, or telephone number) on the Service, that information can be read, collected and used by other users of the Service and may result in unsolicited messages, both commercial and otherwise. You agree that by participating in such online public forums, you will not do so for any purpose that is unlawful or prohibited by the HostelSnap community guidelines that may be in effect from time to time in connection with the Service. We reserve the right to terminate your access to the Service or to take other protective steps if you violate these terms.

12. YOUR CALIFORNIA PRIVACY RIGHTS

If you are a resident of California, pursuant to California Civil Code Section 1798.83, you may request information regarding our disclosure of your personal information to a third party for that party's direct marketing purposes. Any such disclosure made to a third party by us would be otherwise in accordance with the terms of this Privacy Policy. To make such a request, please contact HostelSnap through the email address or physical address listed below.

13. RETENTION OF YOUR PERSONALLY IDENTIFIABLE INFORMATION

The personally identifiable information that you provide will be stored and maintained by HostelSnap until you instruct us otherwise, or, in our sole discretion, for the longer of: (a) for so long as is necessary or appropriate to carry out the purpose(s) for which such information was collected and (b) for so long as we are required to maintain such information by law or other applicable rules or regulations.

14. CHILDREN'S PRIVACY

HostelSnap recognizes the privacy interests of children and we encourage parents and guardians to take an active role in their children's online activities and interests. The Service is not intended for children under the age of 13. HostelSnap does not target its Service to children under 13. HostelSnap does not knowingly collect personally identifiable information from children under the age of 13.

15. CHOICE AND OPT-OUT PREFERENCES

HostelSnap does not collect your personally identifiable information unless you choose to provide it. If, at any time, you prefer not to receive further email communications from HostelSnap or our client hostels (except in connection with information, products or services that you specifically request), you will have the ability to unsubscribe from such communications by means of a link provided in every broadcast email that is sent to you by HostelSnap. If, at any time, you prefer not to receive any other form of communication from HostelSnap, you will have the ability to unsubscribe from such communications by contacting us at: support@hostelsnap.com.

If you choose to sign up for email communications from us, we comply with the CAN-SPAM Act. This means that we will utilize email to communicate with you for a number of purposes, including marketing and promotion of our services. In compliance with the CAN-SPAM Act we agree: (a) not to use false or misleading subjects or email addresses; (b) to identify advertisement in some reasonable way; (c) to

include the physical address of our business; and (d) to allow users to unsubscribe by using the link at the bottom of each email. In the event that we use a third-party email marketing service we will monitor the service for compliance with the foregoing.

16. ACCESS AND ACCURACY

HostelSnap will use commercially reasonable efforts to provide access to your personally identifiable information if you request such access in writing submitted to: support@hostelsnap.com.

HostelSnap reserves the right to deny access to your personally identifiable information: (a) when such denial of access is required by law; (b) when granting you access is reasonably likely to negatively impact other people's privacy.

If you believe that the personally identifiable information maintained by HostelSnap about you is inaccurate or incomplete, you may notify HostelSnap in writing describing in details any inaccuracies or omissions, submitted to: support@hostelsnap.com. Following receipt of such a properly submitted written notice, HostelSnap will, within a reasonable time period, use commercially reasonable efforts to, in its sole discretion, either: (i) amend or correct your personally identifiable information to reflect corrected or additional information provided by you, or (i) in connection with your personally identifiable information, make note of any claimed inaccuracies or omissions reflected in the notice submitted by you.

17. YOUR ACCEPTANCE OF THIS PRIVACY POLICY AND REVISIONS TO THIS PRIVACY POLICY

By using the Service you agree to this Privacy Policy. If you do not agree to this Privacy Policy, you may not use the Service. HostelSnap reserves the right, in our discretion, to change, modify, add or remove portions of this Privacy Policy at any time and from time to time, without prior notice to you. All revisions will be posted to the Service. We urge you to review this Privacy Policy frequently for changes. Your continued use of the Service means that you accept those changes.

18. QUESTIONS OR COMMENTS

HostelSnap welcomes questions and comments about this Privacy Policy. Questions or comments should be directed to HostelSnap's privacy policy compliance department:

VIA EMAIL:
support@hostelsnap.com

VIA U.S. MAIL:
HostelSnap
% Hostel Management International, LLC
730 Commercial Street
San Francisco, CA 94108 USA