

# Data Protection Policy of Huespedia LLC

The Privacy and Personal Data Protection (hereinafter the Privacy Policy) applicable to persons supplying personal data (hereinafter the “Holder”) to society HUESPEDIA LLC (hereinafter “HUESPEDIA”) is presented, which will be included in the databases of HUESPEDIA and will be subjected to treatment by such company.

## 1. RESPONSIBLE AND PROCESSOR

HUESPEDIA LLC, a company established in the state of Delaware, in the United States, constituted with private document of Shareholders dated of October 19th of 2017, with EIN No. 82-3214622.

HUESPEDIA is a company whose economic activity is to develop technologies and lend services related to property rentals management and comprehensive services.

## 2. SCOPE OF THE PRIVACY POLICY

This Privacy Policy applies to all databases and / or files containing personal data which are processed by HUESPEDIA LLC, in the events in which he is considered responsible and / or in charge to process as a data processor Personal data of natural persons, in accordance with the provisions of the 1581 Colombian Constitutional Law 2012, Decree 1377 of 2013 and other rules that henceforth the modified and / or add.

## 3. DEFINITIONS

3.1 Personal Data: Any linked information or may be associated with one or more specific or identifiable natural person

(hereinafter “Personal Information” or “Information\_Personal”).

3.2 Database: any structured set of personal data is processed.

3.3 Treatment: Any operation or set of operations on Personal, such as collection, storage, use, movement or deletion data.

3.4 Data Processor: natural or legal, public or private, which by itself or in association with others, perform the processing of personal data on behalf of the controller.

3.5 Treatment Responsible: natural or legal, public or private, which by itself or in association with others, decide on the Database and / or treatment of the data.

3.6 Title: Natural person whose personal data are processed.

3.7 Data transmission: Personal Data Processing involving communicating them within or outside the territory of the Republic of Colombia when intended to carry out a treatment by the Manager on behalf of the Principal.

3.8 Data Transfer: Data transfer occurs when the Manager and / or processor of personal data, located in Colombia, sends information or personal data to a receiver, which in turn is responsible for treatment and is inside or outside the country.

3.9 Sensitive Data: sensitive data is defined as those affecting the privacy of the owner or the abuse of which may affect the privacy of the Contractor or the potential to generate their discrimination.

3.10 Public Data: Data that are not semi-private, private or sensitive. Are considered public information, among others,

data on the marital status of the people, their profession or occupation and as a merchant or public servant.

#### 4. PROCESSING OF PERSONAL DATA BY HUESPEDIA

4.1 HUESPEDIA in the development of its corporate purpose and economic activity, acts as Responsible and / or processor of personal data held in their databases and databases of its affiliates or subsidiaries and other related companies, worldwide. In consequence collects, stores, uses, transmit, transfer and delete personal data of natural persons with whom you have or have had some kind of relationship, whatever its nature (civil, commercial and / or labor); among which it is included but not limited to, customers, suppliers, contractors, workers, creditors, debtors and shareholders.

#### 5. USE OF PRIVACY POLICY AND PROTECTION OF INFORMATION

5.1 HUESPEDIA informs all holders of personal data that will be supplied, either electronically or manually, the processing thereof shall be subject to this Privacy Policy. Consequently, if a holder is not in accordance with this Privacy Policy, you will not supply any to be registered in one of the HUESPEDIA Databases information.

5.2 HUESPEDIA is committed to safety and proper use of personal data that are supplied and consequently undertakes to give appropriate uses and to maintain the required confidentiality against them according to the provisions of this Policy Privacy and existing legislation against the subject.

5.3 Personal information may be transferred to branches of the same, parents, affiliates and subsidiaries and other related, companies in the same group, to third parties and judicial or administrative authorities, whether natural or legal persons,

Colombian or foreign, those events in which the transfer or transmission of data necessary to carry out the uses and activities authorized by the holders of the corporate purpose of HUESPEDIA. In all events, this information will be kept strictly confidential and will be subject to a rigorous treatment, respecting the rights and guarantees of their owners.

5.4 Specifically, but without limitation, HUESPEDIA may use service providers and data processors working on behalf of it. Such services may include hosting services and maintenance systems, encryption, testing services, courier services, email services, call centers, delivery services, management of payment transactions and credit checks and address, including others. Accordingly, Holders should understand that by supplying information to HUESPEDIA, you are automatically granting authorization to these third parties to access your Personal Information, to the extent that they require to provide their services.

5.5 It is important to note that HUESPEDIA has taken and will take all actions necessary to ensure that both service providers and processors working on behalf of the company and other third parties authorized in accordance with this Privacy Policy, protect, at all events the confidentiality of personal information in their care.

5.6 HUESPEDIA may collect information that is in the public domain to complement databases. Such information will be given the same treatment stated in this Privacy Policy.

## 6. EFFECTS OF THE AUTHORIZATION

6.1 For all purposes, it is understood that the express and informed authorization granted by the Holders for HUESPEDIA for the Treatment of Personal Data, anyone who has been its medium (written, oral or through unequivocal conduct), It

involves understanding and full acceptance of the content of this Privacy Policy.

## 7. PERSONAL INFORMATION COLLECTED

7.1 Personal Information HUESPEDIA can collect and submit Treatment may include but is not limited to the following:

- Full name Holder Information
- ID
- Birthdate
- Nationality
- Home
- Contact address
- Telephone contacts
- Email
- Bank accounts
- Credit and financial information
- Professional information
- Tributary information
- Working Information
- Socio-Economic Information
- Stratum, number of people living in your home, profession and sex
- According to the preferences provided / requested information
- Holder perform activities and provide information regarding the interests, behavior and demographics of the Contractor and his family
- Information bank references and / or commercial

## 8. PURPOSES AND USES OF INFORMATION

8.1 A personal data that are supplied to HUESPEDIA be given a treatment in accordance with the following purposes for the use of the information as you apply to each holder:

- Use of Personal Information by HUESPEDIA, its affiliates, and / or third parties engaged on the occasion and development of its corporate purpose;
- Analysis of Personal Information by HUESPEDIA, its affiliates, and / or third parties engaged in the development and promotion of its services;
- Treatment give information in physical and digital media, ensuring that they are properly used by HUESPEDIA;
- Include in their databases and give treatment to information acquired by virtue of the relationship between owners and HUESPEDIA, whatever their legal nature (labor, civil, commercial), as well as information provided by its related companies national and / or foreign; Contact Head in the event that any kind of problem or inconvenience is generated with the Personal Information;
- Contact Head in the event that any kind of problem or inconvenience is generated with the Personal Information;
- Headlines send emails as part of a news story or Newsletter. In each e-mail sent is possible to request that is not registered on this mailing list to stop receiving them, as described in Chapter 12 of this Privacy Policy;
- Contact and / or to the Contractor information about promotions and / or based on information obtained from this consumption habits and family services;
- Perform marketing communications, promotions and direct marketing campaigns of any plans HUESPEDIA membership and services, as well as its other products and services by any means either virtual or physical. If the holder Alternatively, you can request to be excluded from the lists for sending promotional or advertising information;

- Carry out internal studies to understand profiles, interests, behaviors, demographics, segmentations in order to understand the needs of the Contractor and his family as well as their interests and therefore deliver better benefits and services based on the information provided;
- Prevent and detect fraud and other illegal activities;

Paragraph: It is clarified that regarding third party information related to banking and / or commercial references members, customers, suppliers, contractors, workers, creditors, debtors and shareholders provide will only be used for purposes of corroborating references and responsible granting them warrants that it has the right to give us this information for such purposes; so hold harmless HUESPEDIA any third party claims regarding the use of such information.

## 9. RIGHTS OF HOLDERS OF PERSONAL INFORMATION

9.1 Holders of Personal Information provided to HUESPEDIA have the following rights:

- The right to know, update and rectify its free Personal Information;
- The right to request proof of the existence of the authorization granted to HUESPEDIA;
- The right to be informed about the use that has been given to your Personal Information;
- The power to revoke the authorization and request the deletion of data when use under the authorized uses and purposes is not done;
- The right to submit inquiries and complaints concerning Personal Information.

## 10. CONFIDENTIALITY OF PERSONAL INFORMATION

a) Personal information provided by the Holders will be used only by HUESPEDIA, its affiliates and authorized for such purposes, third parties pursuant to both authorization and this Privacy Policy. Personal information is not intended, in any event, for purposes other than those for which it was provided, why HUESPEDIA seek to protect the privacy of personal information and keep it under security conditions necessary to prevent adulteration, loss, query, use or unauthorized or fraudulent access and respect for the rights of the holders thereof.

b) If for any reason a competent authority requests be disclosed Personal Information, HUESPEDIA notify the owner of such a situation.

c) This obligation of confidentiality of personal information have a time of unlimited duration, ie the obligation subsists in time.

## 11. PERSONAL INFORMATION TREATMENT OF MINORS

11.1 Pursuant to the provisions of Article 7 of Law 1581 of 2012 and Article 12 of Decree 1377 of 2013, in the event that HUESPEDIA proceed to carry out the processing of Personal Information of children and adolescents, will respect the interests of themselves and ensuring, in all cases, respect for their fundamental rights and minimum guarantees.

11.2 Such treatment may only take place to the extent that the services customers purchase, and need to include information of minors.

11.3 In all events that required to treat you to Personal Information of minors, HUESPEDIA obtain the corresponding authorization from the legal representative of the child or adolescent; under previous exercise of their right to be heard,



an opinion which will be assessed in terms of maturity, independence and capacity of the child to understand the content of the authorization and processing of personal data.

## 12. PROCEDURE REFERENCE CORRECTION AND CLAIMS

12.1 Inquiry: Inquiries and requests Holders will be attended by a maximum term of ten (10) working days from the date of receipt thereof. Should not be possible to resolve the query within this period, the Contractor shall be informed of the situation in the direction notification is included in the respective consultation, and the term response may be extended for up to five (5) days additional business. The answer to inquiries or complaints that the Holders presented may be submitted by any physical or electronic means.

12.2 Corrections and Complaints: When the owner of the information or its assignees consider that information should be corrected, updated or deleted, or when warn an alleged breach by HUESPEDIA of their duties regarding the protection of personal data contained in legislation applicable and this Privacy Policy may file a complaint as follows:

- It must be submitted written application against specific requirement;
- If the complaint is incomplete, HUESPEDIA require the interested party within five (5) days of receipt of the application to complete and re-validate your request:
- If it takes two (2) months from the date of application without the applicant has not replied, it is understood withdrawn the claim.
- If the person receiving the complaint is not competent to solve it, it will move to one if it is to resolve within a maximum term of two (2) business days and shall inform the applicant accordingly.
- If the claim is received completely or has subsequently been completed, it should be included, within two (2)

business days, a “legend” in the database indicating “CLAIM PROCESSING”.

- HUESPEDIA resolve the claim within a maximum period of fifteen (15) working days from the day following receipt. Should not be possible to resolve the query within this period, the Contractor shall be informed of the delay, the reasons and date of response notification address you included in the respective claim. In any case, the term response may not exceed eight (8) business days following the expiration of the first term. The answer to complaints that the Holders present may be made by any physical or electronic means.

### 13. CONTACT

13.1 In the event of any questions or concerns about this Privacy Policy or the treatment and use of Personal Information Please direct inquiries, requests or complaints complaints email: [info@huespedia.com](mailto:info@huespedia.com). Written request to the representatives of Huespedia in Colombia., At Carrera 3 No. 7-61, First Floor, Cartagena, Colombia.

### 14. CHANGES TO THE PRIVACY POLICY

14.1 HUESPEDIA is fully empowered to amend this Privacy Policy. Any changes will be duly published in its physical facilities and later on its website [www.huespedia.com](http://www.huespedia.com) and additionally will be informed either by electronic or physical Holders of Personal Information means. The granting of authorization and the registration (s) Page (s) Web will be understood as express declaration of acceptance of this Privacy Policy.

### 15. EFFECTIVENESS

15.1 This Privacy Policy is effective from day nineteen (19) December 2017.