

## Privacy Policy

Thank you for visiting a website owned by YapStone International Limited (“we”, “us” and “our”). Your privacy is important to us. In order to better protect your privacy, we have developed this privacy policy (“Privacy Policy”). The Privacy Policy explains our online information practices and the choices you can make about the way your information is collected and used by YapStone. The Privacy Policy is based on these principles:

- We will disclose how we use the information we collect;
- We will give you an opportunity to restrict our use of the information;
- We will give you an opportunity to tell us not to give the information to others; and
- We will give you an opportunity to correct the information in our records when it has been erroneously recorded.

These principles and our policy apply whether we collect the information by paper or electronic form. The Privacy Policy (together with our Terms of Service on our websites, a written agreement we may have entered into with you, and any other policies on our websites) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By submitting data to YapStone you consent that your data may be used in accordance with the terms of the Privacy Policy.

YapStone will comply with the Irish Data Protection Regime in particular the Data Protection Act 1988 (“Act”) as amended by the Data Protection (Amendment) Act 2003 and the ePrivacy Regulations 2011. In accordance with the Act, YapStone is a data controller that is exempt from registering with the Irish Data Protection Commissioner.

### **1. Information We May Collect from You**

We may collect and process the following data about you:

- Information that you provide by filling in forms, applications, or as part of our customer due diligence procedures. This includes information provided at the time of registering to use our website, subscribing to the Service, posting material or requesting further services. We may also ask you for information when you report a problem with our website.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our services and of the fulfilment of your transactions.
- Details of your visits to our websites including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- When you initiate a payment transaction, we also collect financial information such as credit card, debit card, or bank account details.

- For transaction volumes over a certain limit, we are legally required to report some personal data to the authorities.
- For verification purposes we reserve the right to request proof of identification in an offline format. This may include passport, drivers license, utility bill, company information, or other items we deem necessary to establish identity, residence, or place of business. Such proofs of identification may be stored electronically on our servers in order to comply with our legal and regulatory obligations.
- Your IP address, computer information, and access times may be tracked against your records with us for purposes of preventing fraud, establishing your identity, and creating an audit trail when using the services of YapStone.
- Competitions may be made available on our website from time to time. You do not have to participate in these, however if you choose to you may be asked to disclose some personal information. At the time of entering the competition it will be made clear to you who will have access to your personal information and why. You are not obliged to continue with your competition entry, however if you do so you accept that you may receive a prize.

## **2. IP Addresses, Cookies and Click-Though URLs**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our partners. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We will not sell or rent the information collected to third parties to be used for marketing purposes.

For the same reasons, we may obtain information about your general Internet usage by using a cookie. Cookies contain information that is transferred to your computer's hard drive. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser, and stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. They help us to improve our website and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and to allow us to customise our website according to your individual interests.
- To speed up the delivery of pages you commonly use.
- To recognise you when you return to our website.

We may use both "session" cookies and "persistent" cookies on our website. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date. You may refuse to accept cookies by activating the setting on your browser that allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our website. We do not use cookies for marketing purposes and we do not share them with third parties, other than service providers.

We may use third party cookies to help us improve our website design and user experience. Please note that our partners may also use cookies, over which we have no control.

We may occasionally use a "click-through URL". When you click one of these URLs, you pass through our web server before arriving at your final destination. We track click-throughs to help us improve the user experience, determine your interest in particular topics and measure the effectiveness of our customer communications.

Please be aware that YapStone is not responsible for the privacy practices of other sites. We encourage our users to be aware when they leave our website to read the privacy statements of each and every website that collects personally identifiable information.

### **3. Where We Store Your Personal Data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us, for one of our suppliers, or service providers. Such staff maybe engaged in, among other things, the fulfillment of your transaction, the processing of your payment details, improving our websites and services, technical support, fraud review, and the provision of support services. YapStone may transfer your personal data to YapStone Inc. a group company located in the United States. By submitting your personal data, you agree to this transfer, storing or processing in the United States. YapStone will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service or engage with our customer service team, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **4. Uses Made of the Information**

We use information held about you in the following ways:

- To ensure that content from our websites is presented in the most effective manner for you and for your computer.
- To allow smooth interaction between you and customer support.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our services.
- To perform the necessary due diligence on our customers to ensure you are who you say you are, and to reduce the risks of chargebacks and fraud in our system.
- To build fraud and credit risk models to assist in the screening of users for the purposes of identifying fraudsters, preventing fraud and minimising associated credit risk.

We will not disclose your information to any other third parties except with your explicit permission or as permitted in section 5 of the Privacy Policy.

### **5. Disclosure of Your Information**

We may disclose your personal information to any member of the YapStone group of companies, which includes YapStone International Limited, YapStone Inc. and the subsidiaries of YapStone Inc.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

- If YapStone International Limited, or YapStone, Inc. or substantially all of their assets are acquired by a third party, in which case personal data held by it about customers may be one of the transferred assets.
- In order: (i) to comply with any legal obligation (including reporting obligations under fraud, anti-money laundering, and counter terrorist financing law); (ii) to order, enforce or apply the Terms of Service; (iii) to order, enforce or apply provisions of any agreement with you; or (iv) to protect the rights, property, or safety of YapStone, or one of YapStone's group companies, our customers, or others.
- For the purposes of fraud protection, credit risk reduction, and the prevention and reporting of money laundering.
- Where such third parties provide services to us that facilitate the provision of our services to you.
- Pursuant to a valid request or subpoena from law enforcement, regulators, or other government body.
- With your permission.

## **6. Compliance With US-EU Safe Harbor Framework**

We adhere to the principles of the US-EU Safe Harbor Framework, which you can read more about here: <http://export.gov/safeharbor>. The procedures and standards described in this Privacy Policy are intended to exceed the US-EU Safe Harbor Framework's demanding requirements, as well as the data security requirements established by the payment card industry. For more information regarding how we comply with the US-EU Safe Harbor framework, please read our statement here: <http://holidayrentpayment.eu/en/safeharbor.pdf>

## **7. Your Rights Related to Other Websites**

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **8. Access to Information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of €6.35 to meet our costs in providing you with details of the information we hold about you.

## **9. Changes to the Privacy Policy**

Any changes we may make to the Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail one month prior to the change becoming effective. If we are going to use your personal information in a manner different from that stated at the time of collection we will notify you via e-mail. You will have a choice whether or not to allow us to use your information in this new manner. If you do not contact us stating your refusal to accept the changes to the Privacy Policy within the one-month notice period, you will be deemed to have accepted the changes. If you refused to accept the changes, we may be required to shut down or terminate your ability to use the Services. However, if your account with YapStone has been suspended or closed then you will not be contacted and your information will not be used in this new manner.

## **10. Conflict between the Privacy Policy and the Terms of Service**

Where there is a conflict between the Privacy Policy and an explicit provision of the Terms of Service, the Privacy Policy will prevail over the Terms of Service.

## **11. Dispute Resolution and Independent Recourse Mechanism**

As a payment processor, we are very serious about data security and the integrity of your personal information. If you have a dispute with us regarding this Privacy Policy or related to our handling of personal information, we will swiftly

attempt to address your concerns. Please contact us at the address below with any concerns. All disputes related to this policy, the US-EU Safe Harbor Framework, or our handling of personal data that cannot be informally resolved through direct communication shall be finally resolved by binding arbitration administered by the American Arbitration Association (the "AAA"), and judgment on the award rendered by the arbitrator may be entered in any court having jurisdiction thereof. The arbitration will be conducted in the English language, before a single arbitrator.

## **12. Contact Us**

HolidayRentPayment is the trading name of YapStone International Limited. Questions, comments, and requests regarding this Privacy Policy are welcomed, and should be addressed to: Legal Department, YapStone International Limited, Units 7/8, Millmount Development Centre, Millmount, Drogheda, Co Louth, Ireland.

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