

## **PRIVACY POLICY**

### **IRDTRAVEL**

This Privacy Policy has been adopted by IRDTRAVEL AB (559076-2117) ("IRDTRAVEL") and applies to our processing activities in relation to end-users of our services, visitors of our website and social media pages and individuals communicating with us.

IRDTRAVEL processes personal data in accordance with applicable personal data protection legislation. Within the EU/EEA, the general data protection regulation ("GDPR") will apply from 25 May 2018.<sup>1</sup>

IRDTRAVEL is committed to protect and respect your privacy. Therefore, you are encouraged to carefully read this Privacy Policy in order to learn how we process your personal data within our business.

#### **1. DATA CONTROLLER**

- 1.1 IRDTRAVEL is the data controller of the processing activities carried out by or on behalf of IRDTRAVEL. These activities include *inter alia* the improving of our services and provision of websites and social media presence.
- 1.2 As an end-user of our services, you may provide our business customers (i.e. connected hotels) with personal data, such as your contact details and preferences. Although our business customers are data controllers for the processing of this data, we may also process some of the data for our own purposes, as further described below.
- 1.3 If you have any questions regarding the processing of your personal data, you may contact us via the contact information listed below in section 8.

#### **2. WHAT IS PERSONAL DATA AND DATA PROCESSING?**

- 2.1 Personal data is all information that directly or indirectly (i.e. together with other information) may identify an individual. This means that a wide range of data, such as names, contact details, IP addresses, and behaviour and choices made online are personal data.
- 2.2 Data processing is any operation or set of operations performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, blocking, erasure or destruction of personal data.

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

### 3. IRDTRAVEL'S PROCESSING OF PERSONAL DATA?

#### 3.1 What personal data is collected and processed and when is it deleted?

When you use our services (as provided by the connected hotels), visit our webpage or communicate with us by other means, we may process your personal data, e.g. your name, contact details, email address, customer id, and other information you chose to provide as well as information on how you use the services.

Please note that, as data controller, we do not process the content of your communication with individual hotels connected to our services and the connected hotels provide the communication services to you.

We will process your personal data for as long as it is necessary in order for us to fulfil the purposes of the processing (see section 3.2). We have routines in place to ensure that personal data is deleted thereafter.

We collect the following data from end-users:

Personal data	What is used for
IP addresses	IP addresses is used to provide added security and prevent abuse during sign-up and authentication
Passwords	data used to enable end-user authentication and facilitate end-user account management. It also uses user-agent strings and IP addresses to provide added security and prevent abuse during sign-up and authentication
Email addresses	
User agents	
Approximate locations	used to facilitate higher level of customer service, helps to improve service
User names	used to facilitate higher level of customer service
Photo URL (avatars)	
Timestamps of first usage of service	
Timestamps of last usage of service	
Attached files (attachments)	required to facilitate file transfer

#### Cookies:

We use cookies in our products. In many cases, cookies are necessary to make web widget work. We use cookies to analyse how our products are used and to improve your user experience.

#### 3.2 For what purposes is the data collected and processed?

IRDTRAVEL will process your personal data for the following purposes:

- Improve our products and services, e.g. in order to optimize the service and make it more user friendly, and for follow up and **statistical purposes**.

- **Communicate** with you, e.g. through our social media pages. IRDTRAVEL may also process your personal data for direct marketing purposes including providing you with information on products and services, if you request such information. If you do not wish to receive marketing information, please contact us at [info@instaroom.travel](mailto:info@instaroom.travel).
- For purposes relating to **cookies**, see above.

#### 4. LEGAL GROUND AND LEGITIMATE INTEREST

We will process your personal data when it is necessary to (i) fulfil a request from you or respond to your inquiries (ii) comply with a legal obligation. Your data may also be processed when it is necessary for the purposes of a legitimate interest for IRDTRAVEL, *inter alia*, for improving our services. If a certain data process requires your prior consent, we will collect such consent before carrying out the processing in question.

Personal data that we request from you and indicated as mandatory is required to be provided in order for us to provide the service, e.g. for statutory, contractual, administrative or technical reasons.

#### 5. INFORMATION SECURITY

We strive to provide a high level of protection in all our personal data processing. We have therefore taken organisational and technical security measures in order to protect your personal data from unauthorised access, use, alteration and erasure.

#### 6. TO WHOM DO WE DISCLOSE THE PERSONAL DATA?

- 6.1 IRDTRAVEL may engage third parties for the provision of services to IRDTRAVEL, such as provision of IT-systems, services and other activities. Your data may be shared with and processed by such service providers on behalf of IRDTRAVEL as required for the provision of the services to IRDTRAVEL. Within the use and provision of such services, your personal data may be transferred to countries outside the EU/EEA (third countries). In relation to such third country transfers, certain security measures will be taken in order to protect your data and ensure that the data keeps an adequate level of protection, e.g. by entering into a data transfer agreement including model clauses issued by the EU Commission and available on the EU Commission's website.
- 6.2 Personal data may be disclosed to a third party if we are required to do so according to applicable laws and regulations or in order to detect and prevent fraud or other security or technical problems.

## **7. YOUR RIGHTS UNDER APPLICABLE DATA PROTECTION LEGISLATION**

7.1 According to applicable data protection legislation, you are entitled to certain rights. If you want to exercise any of these rights, please contact us at the address specified in section 8 below.

7.2 As specified in applicable data protection legislation, you have the right to:

- request access to and rectification of the personal data we process in relation to you;
- request erasure of your personal data;
- request that we restrict the processing of your personal data;
- object to the processing of your personal data and, in respect of processing based on your consent, to withdraw your consent at any time; and
- receive personal data about you that you have provided to us.

You are also entitled, at any time, to submit complaints to the relevant supervisory authority if you think that your personal data is being processed in violation of the applicable data protection legislation.

## **8. CONTACT INFORMATION**

If you have any questions regarding the processing of your personal data or want to exercise any of your rights under applicable data protection regulation, you may reach out to us via the following contact details.

- Email: [info@instaroom.travel](mailto:info@instaroom.travel)
- Address: Eternellvägen 20, 218 34, Bunkeflostrand, Sweden
- Tel: 0046-73528 58 68

## **9. UPDATES TO THE POLICY**

This privacy policy was last updated on 17 April 2018. We may update the policy from time to time, e.g. by making new versions available on our website or by providing the update by other appropriate means. You are recommended to visit our website from time to time to learn of any updates.