

Pruvo's Data Protection Policy

1. INTRODUCTION

We at Pruvo, consider your privacy and the security of your personal data as highly important.

This Data Protection Policy (hereinafter, “Policy”) applies to all activities of Pruvo Net Ltd. (hereinafter called “Pruvo” or “We”) with respect to the protection of personal data that We collect, process and store in the course of providing you with our Services.

2. ABOUT THIS POLICY

Pruvo is committed to ensuring that your personal data and data privacy are protected in accordance with the best practices available, as well as according to Pruvo’s relevant legal obligations. This Policy explains your rights regarding the personal data We collect, process and use, as well as Pruvo’s use of safeguards to protect these rights.

The Policy also applies to Pruvo’s use of cookies and tracking tools on the relevant website and application interfaces, as further specified in our Cookies and Tracking Policy.

Your personal data will be collected and stored lawfully, fairly and transparently by Pruvo. In processing your data, We act in good faith, in a proportionate manner, and with the appropriate technical and organizational measures employed, in taking into account the risks represented by the processing and the nature of the personal data protected by us.

From time to time, we may develop new or offer additional services. If the introduction of these new or additional services results in any change to the way we collect or process your personal data we will provide you with more information and additional terms or policies. Unless stated otherwise when we introduce these new or additional services, they will be subject to this Policy.

The aim of this Policy is to:

1. Ensure that you understand what personal data we collect about you, the reasons why we collect and use it, and who we share it with;
2. Explain the way we use the personal data that you share with us in order to provide you with the Pruvo Service; and
3. Explain your rights and choices in relation to our use of the personal data we collect and process about you, and how we will protect your privacy.

Important note: If you do not consent to the collection, use, processing and disclosure of this data as set forth below, then please refrain from browsing our website, logging in to your Pruvo user for the Pruvo’s Price Monitoring Service or Pruvo’s Booking Engine, or otherwise providing Us with your personal data.

3. YOUR RIGHTS AND YOUR PREFERENCES

We will only process personal data if you have consented to such processing, unless We are otherwise legally authorized or obliged to collect and further process personal data relating to you.

Therefore, if We process data solely based on your affirmative consent, We will only use the data for the purposes stated in the consent procedure and within the scope outlined below.

You have the following additional rights:

- **Withdrawal of Consent.** You may file for the revocation or withdrawal of your consent to our collection, use or processing of your personal data at any time by using notifying our Data Protection Officer, at: **E-mail:** DPO@pruvo.com.

Upon receipt of your notification, We will revert back to you and thereafter cease the collection, use or processing of your personal data, or suspend/delete your account, as applicable according to the content of your request, unless We are legally obliged or authorized to retain your personal data, including for ongoing legitimate business interests, and we shall revert back to you in response to your above mentioned notification and shall inform you accordingly in such an event.

- **The “Right to be Forgotten” and Data Correction.** You may also request the erasure or correction of any or all of your personal data, that is held by Pruvo.

Upon sending your request to our Data Protection Officer, at: **E-mail:** DPO@pruvo.com, We will delete/correct your personal data or close/suspend your account/registration and/or remove or correct your personal data from any or all of our records, as applicable according to the specifics of your request, as soon as reasonably possible and when technically feasible, unless there is an overriding legal interest or other authorized basis for the continuation of the data processing, and we shall revert back to you in response to your above mentioned notification and shall inform you accordingly in such an event..

The foregoing notwithstanding, Pruvo will store just enough of your personal data to ensure that the restriction is respected in the future.

In the event of deletion and/or correction of personal data upon your request results in Pruvo no longer being able to provide you with any or all of our services via the website or other application, we shall notify you accordingly, but in so requesting, you hereby irrevocably agree and waive any claim against Pruvo's for our inability to provide the services through the Website, or any interruption or malfunction in Service resulting from fulfilling your request.

Note that your request for deletion or correction of your personal data, may also be rejected by Pruvo for lack of relevant information provided by you, upon which you will be notified accordingly.

- **Transparency.** You are entitled to ask us for information about what type of personal data we hold or have collected on you.

You are also entitled to obtain (in a commonly used and machine-readable form) and reuse your personal data as you have provided to us and which We process by automated means, for your own purposes, across our different services, free of charge, subject to the technical feasibility and lawfulness considerations.

Please forward your request for such an output, in written or machine-readable form, to our Data Protection Officer, at: **E-mail:** DPO@pruvo.com

- **Automated decision-making.** Pruvo shall not intentionally take any potentially damaging decision concerning you because of using automated processing operations without human intervention; and commits to giving you the opportunity to obtain human intervention in such a decision, express your point of view, and obtain an explanation of the decision.

In the implementation of these data protection rights, Pruvo is committed to providing a timely and transparent response to your requests, and upholding your right to contact Pruvo's Data Protection Officer, at: **E-mail:** DPO@pruvo.com

4. WHY PRUVO COLLECTS YOUR PERSONAL DATA AND USES COOKIES ON THIS SITE

PRUVO uses your personal data for the following reasons:

- to ensure that content in the website, booking interface or application interface are presented in the most effective manner for you;
- to process your requests for price monitoring ;
- to process your booking requests through our Pruvo Booking Interface
- to gather statistical information and analytics in order to analyze and improve our website, application interfaces and services.
- To send you e-mails, advertisements and newsletters on deals, discounts and updates on Pruvo's services.

Cookies and tracking tools are employed on our website and in our application and booking interfaces to distinguish you from other users and to improve your use of these interfaces, and in some cases, certain features may not function if you remove the cookies from your browser.

Additional information about the use of cookies and tracking by Pruvo may be found in our Cookies and Tracking Policy, under the title "The Use Of Cookies And Tracking By Pruvo".

5. HOW PRUVO COLLECTS YOUR PERSONAL DATA AND WHICH TYPES OF PERSONAL DATA ARE COLLECTED

- **When you sign up for the Pruvo Service** - when you sign up to the Pruvo Service, we collect your e-mail address and your preferred, personal password.
- **Through your use of the Pruvo Price Monitoring Service** - when you use the Pruvo Price Monitoring Service either by: (1) sending us an e-mail message with your reservation details as an attachment; (2) using our Chrome extension to automatically transmit reservations off your browser; (3) by logging-in to Pruvo through your Gmail account and consenting to our automated scanning of your e-mail messages for reservations; (4) or through uploading the reservation information via your Pruvo account; we collect the personal information, including contact details, the number of inhabitants of the ordered room/s, the designated dates and location of the reservation, and your booking service provider's order number and any other information in that is needed in order to identify the reserved hotel room in a unique way which allows Us to identify the room and hotel you have reserved, over various hotel providers and booking websites. We may also collect automated information from your browser/device such as you your internet provider, your IP address, your browser type and system software, as well as the websites you have visited before being transferred to the Pruvo website and/or application interface, including keywords used for searches.
- **Through your use of the Pruvo Booking Service** – when you use the Pruvo Booking Service, we will collect your full name, contact information, billing address and the number of inhabitants of the ordered room, the designated dates and location of the reservation.

6. HOW WE COLLECT YOUR PERSONAL DATA AND HOW WE USE IT

- The personal data we collect on you and that is used by Pruvo includes the data required for us:
 - To provide you with services we supply in the course of our ongoing business while operating under Pruvo's relevant legal data protection legislation and regulations obligations, including the principles of data protection, reduction and data minimization.
 - To perform analytics and statistical analysis of our Website and Booking Engine's performance and to ensure its stability and integrity;
 - To provide you with the best user experience while using our websites and service interfaces;
 - Using Data tracking technologies, we collect browsing and history data to provide you with personalized advertisements – **Not applicable in connection with Google accounts.**
 - To provide you with personalized offers based on your past usage of our Services - **Not applicable in connection with Google accounts.**
- The data collected and processed is both general in nature, (for example, for technical purposes) and personal data, contact details, signatures and other

information inputted by you, depending on the services selected and utilized by you.

- As is true of most organizations operating websites and apps, we also gather certain information automatically and store it in log files. This information includes but is not limited to IP addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp and click stream data. We use this information to analyze trends, to administer the site, to track users' movements around the site and to gather information about our user base as a whole. We may temporarily link this automatically-collected data to personal information for legitimate business purposes, such as to detect and prevent fraudulent activity; and other authorized purposes.
- When you receive services from Us as part of our Pruvo Booking Service, you may also be directed to third-party processors such as payment service providers, including credit card or online payment providers. When Pruvo uses such third-party payment processors, We do not store credit card details, but instead rely on the third-party service provider to process personal data in order to provide these services, and Pruvo contractually engages with internationally recognized third-party payment processors which comply with the applicable data protection and other laws and regulations applicable to their payment processing services. Please check the respective service provider's relevant privacy terms and compliance with applicable laws prior to inputting and making use of any such payment processor's services.
- If you have questions regarding our use of payment service providers, please get in touch with our Data Protection Officer, at: **E-mail:** DPO@pruvo.com
- Our website employs online advertising, tailored to the individual user, as practice known as "Online Behavioral Advertising" which uses cookies to discover general information about the pages you visit. Our advertising delivery systems and partners uses the limited information available to it to serve adverts to you, which it believes are relevant. It does not collect personal information such as your name, email address postal address or telephone number.

Behavioral retargeting is another form of Online Behavioral Advertising that enables us and some of our advertising partners to show you advertisements based on browsing patterns and interactions with the site away from our sites.

- From time to time, Pruvo may share this aggregated data with our advertising partners. This could mean that when you are on other websites you are served advertising based on your behavior across Pruvo's website and service interfaces, or you may be served advertising based on your behavior on other sites.

If you want to opt out of receiving Online Behavioral Advertising this does not mean that you will no longer receive advertising when you are using our

website. It just means that the advertising you see will not be customized for you. If you would like more information about online behavioral targeting and how to opt out of it, please visit www.youronlinechoices.com or you can also visit <http://www.networkadvertising.org>.

- Our websites and booking interface may, from time to time, contain links to and from websites of our partners' networks, advertisers and affiliates. We cannot control or be held responsible for third parties' privacy practices and content and if you click on a third-party advertisement or link, please understand that you are leaving the Pruvo website or interface and any personal data you provide will not be covered by this Policy and such third-party websites are governed solely by such third parties' privacy policies; you are advised to be careful and check any such third party's privacy policies and compliance with laws, prior to inputting and/or supplying them with any of your personal data.

7. Transfer to Third Parties and Transfers outside your Country:

- When using our Booking Service, the external service providers and affiliated companies, such as hotel providers. In these cases, however, the extent of data transmitted is kept to the necessary minimum in order to process your order.
- Pruvo may need to transfer your personal data, as input by you, for the purpose of using our Booking Service, to parties in locations outside the country in which you are physically located, potentially including countries which may not require an adequate level of protection for your personal data compared with that provided in your country.
- In these cases, we will employ all reasonable, commercial efforts to ensure that a reasonable level of data protection is established with the recipient, before transmitting your personal data.
- The aforesaid notwithstanding, by accepting this Policy, you expressly consent to the data transfer as described herein, even if the level of data protection is not up to those customary in your country, and if you are a resident of the European Union, this includes transfers to countries outside of the EEA/EU or without European Union Adequacy decisions.
- For more information on the Countries subject to the European Union's Adequacy Decisions, please click [here](#).

8. Data retention and deletion

Pruvo deletes personal data where the business purpose for which the data was being collected or processed ceases to apply, or if applicable data protection rules require us to delete such personal data, unless we have overriding legal interest or other authorized lawful basis for the continuation of the data processing.

However, we shall keep your personal data only as long as necessary to provide you with the Pruvo Service and for legitimate and essential business purposes, such as maintaining the performance of the Pruvo Service, making data-driven

business decisions based on statistical information from our user base about new features and offerings, complying with our legal obligations, and resolving disputes, such as the following circumstances:

- If there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute we will retain the necessary personal data until the issue is resolved;
- Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users. The above notwithstanding, there are types of personal information that we will only retain for as long as you are a user of the Pruvo Service, such as your user name, your password and we will delete them upon your request for unsubscription or following your express request as mentioned in the "Your Rights and Preferences" section above.

9. Pruvo's Protection of your Personal Data

We are committed to protecting our users' personal data. We implement all reasonably appropriate, industry-standard technical and organizational measures to protect your personal data against loss, alteration, theft or access by unauthorized third parties

The above notwithstanding, no system is completely secure, and Pruvo will not be liable or responsible for any damage or loss resulting from the improper use of its Services and/or any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data.

Your password protects your user account and you are responsible for maintain its security and integrity, so we encourage you to use a unique and strong password, not to share it with third-parties, as Pruvo will not be liable for any actions taken through your username.

If you have reason to believe your password has been stolen or compromised, please contact us as soon as possible at: info@pruvo.net, so we may suspend your account and assist you in renewing your password.

10. Children

The Pruvo Service is not directed to children under the age of 16 years. However, in some countries, stricter age limits may apply under local law and if you are under the age limit applicable to your country, please do not use the Pruvo Service, and do not provide any personal data to us.

We do not knowingly collect or process personal data relating to children and minors under the age of 18 years, or less according to applicable local laws unless We are legally obliged to do so.

If We become aware that personal data was transferred to us or collected by us relating to children and minors under the age of 18 years without the informed consent of a parent or legal guardian, We will delete such personal data without undue delay as soon as reasonably possible, including where necessary deleting the account/username opened by the minor.

11. Changes to this Privacy Policy

We may revise this Policy from time to time, and such changes shall come into effect from the moment Pruvo notifies you of such changes and/or updates, either by email, on the Websites or in some other reasonable manner.

When we make material changes to this Policy, we'll provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the Pruvo website or Booking interface, or by sending you an email or prompt a pop-up window when you next log-in to your username.