

Updated and Effective: April 1, 2023

This Privacy Policy (“Policy”) applies to Beyond’s business-focused websites, products and services (the “Platform”), owned and operated by Ten Twenty Four, Inc. d.b.a. Beyond Pricing and its family of companies (“Beyond,” “we,” or “us”). This Policy describes how we collect, use, and disclose information we collect about users who create accounts through the Platform (either a “Subscriber” or “User”, each a “Beyond User”) and choices we provide regarding use, access and correction of personal information. We use, share, store, and otherwise process the data we collect through the Platform as disclosed in this Policy. Note that we may receive or collect certain data as a service provider/processor on behalf of Beyond Users, but that data is controlled by the Beyond User with whom consumers interact, as more fully described below.

Your use of the Platform is subject to the following terms:

<https://www.beyondpricing.com/terms-of-service> and/or the terms of a contract between you or your employer and Beyond (“Terms of Service”). This Policy does not cover or affect the confidentiality, or our use of our customers’ business content, data, or other proprietary information as defined in and governed by an applicable contract. There may be additional terms posted that apply to your use of the Platform or a specific feature offered through the Platform. By using the Platform, you consent to our Policy, Terms of Service and any additional applicable policies and terms we post.

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1. Personal Information We Collect

We may collect information from you directly, automatically when you visit the Platform, and from third parties. Some of this information may be considered “personal information” under various applicable laws. We consider information that identifies you as a specific, identified individual (such as your email address) to be personal information. We will also treat additional information, including IP addresses and cookie identifiers, as “personal information” where required by applicable law. Note that we may de-identify or pseudonymize personal information so that it is non-personal, such as aggregating or converting it to a code, sometimes using a function commonly known as “hash”. We will treat de-identified information as non-personal to the fullest extent allowed by applicable law. If we combine non-personal information with

personal information, then we will treat the combined information as personal information under this Policy. We maintain and use de-identified data without attempting to re-identify it, except where permitted by applicable law, such as to determine whether our de-identification processes satisfy legal requirements.

Note that there may be times we collect or receive information from Beyond Users in connection with their use of the Platform, but in those cases we act as a service provider/processor and use such data to provide the services (“User Services”). For the User Services, we collect, use, share, and otherwise process the data on behalf of Beyond Users and as directed by Beyond Users. The Beyond Users control the collection, use, sharing, and other processing of personal information that they collect through the User Services.

Information You Provide Directly

Personal information we may collect from you as a Beyond User when you use our services includes the information you provide when you create an account, including email and password, billing address, and payment information (for example, credit card information or ACH bank transfer), which may be processed by a third party payment processor.

You may provide other information or we may collect information when you use our Platform or otherwise interact with us, including personal information, demographic information or information about your listings or preferences.

Beyond Users may choose to provide us email addresses or contact information of other people, such as if you add team members or other users with access to your account or through a support request. If you disclose any personal information relating to other people to us, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

Information We Collect Automatically as You Access and Use the Platform

We and our third party business partners (including third party analytics, advertising and other business providers) may use a variety of technologies, including cookies and web beacons, that automatically or passively collect information whenever you access or interact with the Platform (“Usage Information”). You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service. Usage Information may include the hardware model, browser, and operating system you are using, the URL or advertisement that referred you to the Platform, the search terms you entered into a search engine that led you to the Platform, among other information. We may use Usage Information for a variety of purposes, including enhancing or otherwise improving the Platform. In addition, we may automatically collect your IP address or other unique identifier (“Device Identifier”) for any computer, mobile phone, or other device you may use to access the Platform.

The methods used to collect Usage Information may include the following:

- **Cookies and Local Storage.** “Cookies” are small text files stored locally on your device they are used to visit the Platform or otherwise access our online content. Cookies may be used for many purposes by us and our third party service providers, such as automatically

collecting Usage Information, enabling features, and remembering your preferences. For example, we may use “persistent cookies” to save your registration ID and login password for future logins to the Platform and we may use “session ID cookies” to enable certain features of the Platform, to better understand how you interact with the Platform and to monitor aggregate usage and web traffic routing on the Platform. If you do not want to accept cookies, you can block them by adjusting the settings on your browser. You can find more information about cookies and how they work at www.allaboutcookies.org.

Certain browsers or browser add-ons may provide additional local data storage mechanisms that are used in a manner similar to cookies, and some of the content included on our Platform may make use of this local storage. If you choose to disable cookies, or to otherwise restrict local storage, some features of the Platform may not function properly.

- **Web Beacons.** Small graphic images or other web programming code called web beacons (also known as “1x1 GIFs” or “clear GIFs”) may be included in our web pages and email messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a web page or email can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Platform, to monitor how users navigate the Platform, to count how many emails that were sent were actually opened or to count how many particular links were actually viewed.
- **Embedded Scripts.** An embedded script is programming code that is designed to collect information about your interactions with the Platform, such as the links you click on. The code is temporarily downloaded onto your device from our web server or a third party service provider, is active only while you are connected to the Platform, and is deactivated or deleted thereafter.

In addition, we may use a variety of other technologies that collect similar information for security, fraud detection, site functionality and operational purposes.

We may record your interactions with the user interfaces, including, what pages you visit on the Platform and how long you visit those pages, the links you click, and your path through the Platform. We capture this for website analytics purposes, solely for our internal business purposes, to improve the Platform and our products and services as well as to address functionality issues.

When you participate in live chat sessions on the Platform, Beyond can record and use your communications and the information you provide in order to assist you during the live chat session, to improve the Platform, and for marketing purposes.

Information About Your Listings

Information we collect regarding your listings through the Platform or websites we may host on your behalf as a service provider/processor include address, guest information, amenities, photos, reservation length/amounts, and pricing. You may provide other information or we may collect information when you use our Platform or otherwise interact with us. Any personal information collected about your guests or other consumers who interact with you or your websites we may

host on your behalf as a service provider/processor is information that you control and we process only to provide and improve the Platform and our services.

Location Data

We may directly collect specific location information from your device if you have opted-in to such collection through one of our applications. You may be able to turn off the collection of location information through your device settings. However, please note that we may still be able to collect or infer your approximate location through other information we collect, such as IP address. In addition, some mobile service providers may also provide us or our third-party service providers or business partners with information regarding the physical location of the device used to access the Platform.

Information We Collect From Property Management Systems And Other Third Party Platforms and Partners

We may permit you to link your accounts to third party property management systems (“PMS”). When you link to a PMS through the Platform, we will receive information about you and your listings such as metadata (e.g. address, amenities, photos, reservation length/amounts, etc.) and pricing data. The information we collect about you via a PMS is subject to this Policy. The information collected and stored by the PMS remains subject to the PMS’s privacy practices, including, without limitation, whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third-party website or service. We process any personal information we collect from PMS systems (e.g. guests who make bookings at your listings including guests’ names) as a service provider/processor in providing our User Services.

We or the PMS may allow you to unlink your account, in which case we will no longer collect information about you through the PMS, but we may retain the information previously collected.

We may receive information about you from other third party business partners (including companies that assist us with online advertising and analytics), data providers who enhance the information we have about you, referral partners, and sources of publicly available information. If you are an existing user of Beyond, or later become a user of Beyond, we may combine the information we receive about you from other users with other information we have about you to better understand your interests and preferences and better market our products and services to you.

We may combine the information we receive from those other sources with information we collect through the Platform. In those cases, we will apply this Policy to the combined information. The information collected and stored by the third party is subject solely to the third party’s privacy practices.

Social Media Features

The Platform may permit you to interact with a third party platform for example, by including a button allowing you to link to a third party platform (such as Instagram or Twitter) or interacting

with you through your social media account (“**Social Media Features**”). When you access a third party platform through a button on our Platform, both we and the third party may have access to certain information about you and your use of the Platform and the third party platform, and these third party companies may collect information about your visit to our Platform through the Social Media Features we have integrated into the Platform. Note that through the Social Media Features, these third party companies may be able to collect certain information about your visits to the Platform regardless of whether or not you affirmatively interact with the Social Media Features and whether or not you are logged into (or have) an account with the third party platform.

If you use Social Media Features, your interaction and personal information may be publicly disclosed on the third party platform.

The information we collect in connection with Social Media Features is subject to this Policy; the information the third party platform collects is subject to the third party’s privacy practices (including whether the third party shares information with us, the types of information shared, and your choices about what is visible to others on the third-party platform).

2. How We Use Personal Information

We may use non-personal information for any purpose, including for advertising, research, marketing purposes, and providing recommended pricing for your listings and other services through the Platform. We also use information collected from or about you, including personal information and Usage Information, as disclosed in this Policy, including to:

- enable you to access and use the Platform, the User Services, or other services we offer, including maintaining your account information, managing transactions, and verifying information you provide to us, including that your email address is active and valid;
- better understand your needs and interests;
- provide and offer software updates and product announcements;
- communicate with you, such as responding to your questions, complaints, or comments and getting your feedback, and send you important notices regarding the Platform, our policies, about us as well as marketing, advertising, and promotional messages that may be of interest to you;
- contact you about administrative matters, such as changes to our Policy, Terms of Service <https://www.beyondpricing.com/terms-of-service>, or other policies;
- for internal business purposes, such as improving the Platform, and to comply with legal requirements;
- processing payments and as otherwise necessary in order to communicate with you about processing payments;
- tailor and target content, advertisements and offers we display to you or others on the Platform or elsewhere online;

- operate and protect the Platform from errors, misuse of the Platform, fraud, any criminal activity, and other illegal activities or activities that violate our terms and policies, detect and troubleshoot problems, resolve disputes, and enforce applicable agreements and policies; and
- as otherwise disclosed in this Policy, for other reasons that we disclose when you provide your information, or otherwise with your consent.

3. Information Sharing and Disclosure

We may share non-personal information and Usage Information, with third parties in our discretion. We do not share your personal information with third parties for those third parties' own direct marketing purposes unless you consent (opt-in or opt-out) to such sharing.

We may share personal information as disclosed when you provide it, with your consent, as described elsewhere in this Policy, and in the circumstances described below:

Subsidiaries and Affiliates

We may share your information with our affiliates and subsidiaries (“Corporate Affiliates”) for internal business, analytical, and operational purposes.

Service Providers

We use third party service providers to provide services to us or on our or your behalf, such as payment processing and sending marketing communications. We give these third parties access to your personal information (or allow them to collect information from or about you) so that they can provide these services.

Property Management Systems

If you link your account to a PMS, the PMS may receive certain booking information such as guest information and calendar days when your properties may be booked. The PMS gets such information to help manage your bookings by, for example, knowing which dates your properties are booked.

We encourage you to read the privacy policies of the PMS's and other third party platforms you use that may collect and use your information that we share when you link your account to a PMS, as PMS's have their own policies.

Referral Partners

If you create an account with Beyond via one of our referral partners, the referral partner may receive certain information such as whether or not you created an account with Beyond. These referral partners get access to this personal information so that Beyond and the referral partners can track the referral partners' services such as to determine referral partner compensation for their referral services.

Business, Tax, and Legal Purposes

To the extent permitted by law, we may transfer and disclose your personal information to third parties to protect the integrity of the Platform, enforce or protect our Terms of Service or the

rights, property, safety, security of us or any individual; for fraud prevention; in an emergency, to protect the health and safety of our users or the general public. In other cases, unless otherwise required by law, Beyond will only reveal your information to federal, state, or local agencies (“Government”) in the event the Government issues a subpoena, court order, or other binding Government request (“Request”). We will respond to such lawfully authorized, properly served Requests, to the extent required by applicable law.

Business Transfers and Transitions

We may, in evaluating or engaging in a sale of assets, bankruptcy, merger, or other corporate transaction (including, without limitation, during the course of any due diligence process), transfer or assign your personal information, which you agree that we may do without your further consent.

4. Third Party Advertising and Analytics Providers

We work with network advertisers, ad agencies, analytics providers, and other advertising partners to serve Beyond ads online and to provide us with information regarding use of our Platform and effectiveness of our advertisements. These third parties may set and access their own tracking technologies on your device (including cookies), and they may otherwise collect or have access to certain information about your use of the Platform. Some of these parties may collect personal information over time when you visit and/or access the Platform or other online websites and services. We may share information, typically information that has been aggregated or de-identified, Usage Information, and location information with third party advertising companies, analytics providers, and other third parties for the purpose of advertising and serving you more relevant ads off the Platform.

We use a variety of third parties to perform advertising and analytics services, and some of these companies may be members of the Network Advertising Initiative (“NAI”) or Digital Advertising Alliance (“DAA”). You may wish to visit <https://optout.networkadvertising.org>, which provides information regarding targeted advertising and the opt-out procedures of NAI members, including opt out mechanisms for web browsers, mobile and other connected devices, and a tool to opt out from participating NAI members using your hashed email address for interest-based advertising. You may also want to visit <https://optout.aboutads.info/>, which provides information regarding targeted advertising and offers an opt-out for DAA-participating companies.

Mobile devices may contain settings that allow you to disable tracking advertising and/or analytics. In addition, the digital advertising industry has provided the ability for mobile users to register their intent not to receive targeted advertising at <http://www.aboutads.info/appchoices>.

One of the third party tools we use is Google Analytics, which uses cookies and other technologies to collect and analyze information about use of the Platform and provide other reports. This service may also collect information regarding your use of other websites, apps, and online resources. For information about opting out from Google, click here: <https://support.google.com/ads/answer/2662922> and to download the Google Analytics opt-out browser add-on from Google, click here: <https://tools.google.com/dlpage/gaoptout>.

Please note that opting out through these mechanisms does not opt you out of being served advertising and you will continue to receive generic ads while online.

5. “Do Not Track” and Global Privacy Control Signals

Do Not Track

Please note that your browser settings may allow you to automatically transmit a “Do Not Track” signal to websites and online services that you visit. When you choose to turn on the “Do Not Track” setting in your browser, your browser will send a signal to websites, analytics providers, advertisement networks, plug-in providers, and other web service providers you encounter while browsing and stop tracking your activity. To find out more about and set up “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Global Privacy Control

Global Privacy Control (“GPC”) is a technical specification in your browser settings that you can use to automatically inform websites of your privacy preferences with regard to third party online tracking. To find out more about and set up GPC, please visit <https://globalprivacycontrol.org/#about>.

6. Third Party Content and Links

This Policy does not apply to the practices of third parties that we do not own or control, including, but not limited to, any third party websites and services (and the information or content contained therein) (“Third Party Services”) that may be linked to or from Beyond and/or that you elect to access through the Platform. When you navigate away from the Platform to another site, this Policy is no longer in effect. Those Third Party Services may use their own cookies or other tracking technologies, may independently collect information from you or about you, and match your data with data from other sources and use your data in ways other than described in this Policy. Your browsing and interaction on any Third Party Services is subject to such Third Party Services’ own rules and policies, which we encourage you to review prior to providing them with your information.

7. General Audience Platform

The Platform is not intended for individuals younger than the age of eighteen (18), and we request that these individuals do not provide personal information through our Platform. We do not knowingly collect information from individuals younger than eighteen (18).

8. Data Security & Retention

We use commercially reasonable security measures to protect against loss, misuse and alteration of your personal information under our control. When you enter personal data such as a credit card number on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL). However, no system can be 100% secure. While we strive to safeguard your personal information, we cannot guarantee or warrant the security of any information you disclose or transmit to us, or that we transmit to you, or guarantee that it will be

free from unauthorized access by third parties. You use the Platform and provide us with information at your own initiative and risk.

We will retain your information for as long as it is reasonably necessary for the purposes set out in this Policy, considering the time period reasonably necessary to: provide the Platform to you; comply with our contractual obligations; enforce our agreements; comply with legal and regulatory requirements; resolve disputes; and as permitted by applicable law. Except as noted differently on the Platform, we retain your information while you have an account with us, or while you are using the Platform. If you wish to cancel your account or request that we no longer use your information to provide you services, email legal@beyondpricing.com and request deletion. Consistent with these requirements, we will try to delete your information quickly upon request. Please note, however, that there might be latency in deleting information from our servers and we may retain backed-up versions after deletion.

9. Your Choices About The Information We Collect

We may provide you with the option to view and update your information through the profile section of your account. In addition, you may opt-out of marketing communications as set forth below.

Email

You may unsubscribe from marketing emails we send you through the opt-out mechanism included in each such email. Note, however, that we reserve the right to send you certain communications relating to your use of our Platform, notices of changes to this Policy or other terms, or similar administrative and transactional messages.

Text Messages

If you sign up to receive SMS or MMS messages from Beyond, you may unsubscribe by replying “STOP”.

Push Notifications

We may send promotional and non-promotional push notifications or alerts to your mobile device, and may in some cases do so based on your device’s location or physical proximity to a beacon. You can elect to stop receiving those messages at any time by changing the notification settings on your mobile device.

Other Privacy Rights

If you are a Canadian resident, please see our **Additional Information For Canadian Residents**. If you are a **UK or EEA resident**, please see our Notice to European Economic Area/United Kingdom Residents for additional information about how to exercise your privacy rights.

10. Changing Or Deleting Your Information

If you are a registered user, you may review, update, correct or delete the Personal Information provided in your registration or account profile by changing your “account settings.” If your

personally identifiable information changes, or if you no longer desire our service, you may update or delete it by making the change on your account settings. In some cases we may retain copies of your information if required by law. For questions about your Personal Information on our Service, please contact legal@beyondpricing.com.

11. Changes To This Privacy Policy

To the extent allowed by applicable law, we reserve the right to change this Policy at any time without prior notice. We suggest you review the policy from time to time. If we make changes to this Policy, we will revise the “Last Updated” date at the top of this policy. We may also provide notice to you in other ways, such as through contact information you have provided, and provide you with the ability to opt-in or opt-out of the changes as required by law. Your use of the Platform following these changes constitutes acceptance of the revised Policy.

12. Contact Us

If you have any questions, comments, or concerns regarding our Policy and/or practices, please send an email to legal@beyondpricing.com or to the following address:

Beyond Pricing
452 2nd Street, Suite 602
San Francisco, CA 94107

13. Additional Information for Canadian Residents

We make reasonable efforts to notify you of the purposes for which personal information will be used or disclosed and if the initial purpose changes. Please note, you may withdraw consent at any time (subject to legal or contractual restrictions and reasonable notice). Subject to certain limits set out in the applicable laws, Canadian residents also have the right to request access to the personal information that Beyond collects and to update or correct personal information if it is inaccurate.

If you are a Canadian resident and would like to submit a request to access your personal information or to withdraw consent to the processing of your personal data, you must submit your request by sending an email to legal@beyondpricing.com. You may also use this contact to submit any requests for information on Beyond’s privacy practices or to submit a complaint regarding our practices.

Your request or complaint must include your full name, street address, city, province, postal code, and an email address so that we are able to contact you if needed regarding this request.

We cannot properly process requests or complaints that do not come through the designated request mechanism or do not contain sufficient information to allow us to process your request. You may also be required to take reasonable steps as we determine from time to time in order to verify your identity and/or the authenticity of the request. Once your request is processed, absent exemptions, we will provide you with details regarding what personal information we have, how it is used, and with which third parties it is shared.

Canadian residents may have additional rights under Canadian law, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and successor legislation. Please see the website of the Office of the Privacy Commissioner of Canada (www.priv.gc.ca) for further information.

Canadian residents also may learn more about interest-based advertisements from participating third parties in Canada at the Canadian DAA choice page at <https://youradchoices.ca/choices>.

You and we confirm that it is our wish that this Policy, the Terms of Service, any other services agreement, and all other related policies be drawn up in English. *Vous reconnaissez avoir exigé la rédaction en anglais du présent document ainsi que tous les documents qui s'y rattachent.*

14. Notice For European Economic Area/United Kingdom Residents

If you are a resident of the European Union (“EU”), other European Economic Area (“EEA”) countries, or of the United Kingdom (“UK”), the following information applies.

Purposes of processing and legal basis for processing: We process personal data on the following legal bases: (1) with your consent, for example when you sign up to receive our newsletter. You can withdraw your consent anytime as described below; (2) as necessary for our legitimate interests where those interests do not override your fundamental rights and freedoms related to data privacy (e.g. providing the Platform to you, direct marketing, product development, analytics, internal business purposes, financial reporting, business transfers, and data security); (3) as necessary for the performance of a contract between Beyond and you (for example, to process payments based on your bookings); and (4) as necessary to comply with legal requirements (for example, to make mandatory disclosures to law enforcement).

Data Subject Rights: Under the UK and EU General Data Protection Regulation (“GDPR”) and Data Protection Act, you have the following rights:

- **Withdraw consent:** If we have collected personal data with your consent, you have the right to withdraw that consent at any time.
- **Access:** You have the right to request access to personal data we collected about you and information about its sources, purposes, and sharing.
- **Correction:** You have the right to request that we correct the personal data we hold about you if it is inaccurate or incomplete.
- **Erasure:** You have the right to request that we erase data we have collected from you. Please note that we may have a reason to deny your deletion request or delete data in a more limited way than you anticipated, e.g., because of a legal obligation to retain it.
- **Portability:** You have the right, in certain circumstances, to request that we provide your personal data to you in a format that can be transferred to another entity.
- **Restrict Processing:** You have the right, in certain circumstances, to request that we limit our processing of your personal data if you are contesting the accuracy of your personal information; asserting that our processing is unlawful; asserting that we need to keep the information for reasons related to the establishment, exercise, or defense of legal claims, or you object to our processing.

- **Object:** You have the right to object to our processing if we are processing your personal data based on legitimate interests, using your personal information for direct marketing (including profiling), or processing your personal data for purposes of scientific or historical research and statistics.

To make any of the above requests, please contact us by emailing us at legal@beyondpricing.com.

International Transfers. Personal data we collect may be transferred to, and stored and processed in, the United States or any other country in which we or our subcontractors maintain facilities. Transfers of personal data to a third country without an adequacy decision (as that term is understood pursuant to Article 45 of GDPR) are required to be subject to appropriate safeguards such as standard contractual clauses. In certain cases, we rely on your consent to facilitate the transfer, processing, and storage of your data in the United States and other jurisdictions, where laws regarding processing of personal information may be less stringent than the laws in the EEA or UK.

Automated Decision Making. While Beyond makes automated decisions regarding our recommended listing price for any properties you list in the Platform, such decisions are not based on any of your personal data. As such, we do not use your personal data to make automated decisions or for profiling, as those terms are used under EU and UK GDPR.

Third Party Advertising. As discussed above, we work with certain third-party advertising companies in connection with our online advertising and those companies may set cookies or other tracking technologies in connection with providing advertising related services to us. The EDAA has developed a guide to online behavioral advertising and has developed an opt-out page to manage online behavioral advertising preferences with participating EDAA member companies available for UK and EU residents at <https://www.youronlinechoices.com/>.

Contact Us in the EU and UK.

If you are in the European Union, you may contact us at:

Beyond Pricing
Passeig de Gràcia 98, 5º
08808 Barcelona
Spain
legal@beyondpricing.com

If you are in the United Kingdom, you may contact us at:

Oury Clark
10 John Street
London, England
WC1N 2EB
legal@beyondpricing.com

Right to lodge a complaint: EU and UK residents have the right to lodge a complaint about our data collection and processing actions with the Information Commissioner’s Office (“ICO”) in UK and the relevant national supervisory authority where you reside in the EU, if you believe we have not resolved your concerns. Contact details for UK’s ICO are available here: <https://ico.org.uk/global/contact-us/>. Contact details for national supervisory authorities in the EU are available here: https://edpb.europa.eu/about-edpb/board/members_en.