

# Privacy Policy

## Introduction

Welcome to Casetta Group's privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy explains how we collect, use, disclose, retain, and protect your personal data when you visit or use our websites, and provides information regarding your privacy rights.

This policy applies to all information we collect on our websites and through emails or other electronic communications between you and us.

This privacy policy is divided into the following topics:

1. IMPORTANT INFORMATION AND WHO WE ARE
2. THE DATA WE COLLECT ABOUT YOU
3. HOW IS YOUR PERSONAL DATA COLLECTED?
4. HOW WE USE YOUR PERSONAL DATA
5. DISCLOSURES OF YOUR PERSONAL DATA
6. DATA SECURITY
7. DATA RETENTION
8. YOUR LEGAL RIGHTS
9. CONTACT INFORMATION

Important information and who we are

## Purpose of this privacy policy

- This privacy policy aims to give you information on how we collect and process your personal data through your use of our websites.

- Our websites are not intended for children under 18 years of age. No one under age 18 may provide any personal information to or on our websites. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on our websites or on or through any of their features, make any purchases through our websites, or provide any information about yourself to us.
- It is important that you read this privacy policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **Controller**

Casetta Group, LLC, a Delaware limited liability company (collectively referred to as "Casetta Group", "we", "us" or "our" in this privacy policy), is the controller and responsible for your personal data collected through its websites. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below. Where we have a legal obligation to do so, we will appoint a data protection officer (DPO) to be responsible for this privacy policy.

### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact us using the following contact information:

- This privacy policy aims to give you information on how we collect and process your personal data through your use of our websites.
- Our websites are not intended for children under 18 years of age. No one under age 18 may provide any personal information to or on our websites. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on our websites or on or through any of their features, make any purchases through our websites, or provide any information about yourself to us.
- It is important that you read this privacy policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy

supplements other notices and privacy policies and is not intended to override them.

### **Prohibited Uses**

You may use these Sites only for lawful purposes and in accordance with these Terms of Use.

You agree not to use these Sites:

- To: Casetta Group, LLC
- Email address: info@poppyhospitality.com
- Postal address: 10 East Yanonali Street, Suite 109, Santa Barbara, CA 93101
- Telephone number: 213-302-4150

### **Changes to the privacy policy and our duty to inform you of changes**

- We keep our privacy policy under regular review. This version was last updated on the date specified at the top of this privacy policy.
- Our privacy policy may change from time to time. Your continued use of our websites will be deemed acceptance of those changes, so please check this privacy policy regularly for updates.

### **Third-party links**

- Our websites may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave any of our websites, we encourage you to read the privacy policy of every website you visit.

### **The data we may collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, date of birth and gender.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites.
- Profile Data includes your username and password, purchases made by you, your preferences, and feedback and survey responses.
- Usage Data includes information about how you use our websites, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also may collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

#### **If you fail to provide personal data**

Where we need to collect personal data and you fail to provide that data when requested, we may not be able to perform certain services for you. In this case, we may have to cancel a

service you have requested from us and we may notify you if this is the case at the time.

### **How is your personal data collected?**

We may use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact, and Financial Data by using our websites, filling in forms or by corresponding with us by mail, phone, email or otherwise. This includes personal data you provide when you:
  - create an account on our websites;
  - use our service; or
  - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:
  - Technical Data from the following parties:
    - analytics providers such as Google;
    - advertising networks such as Google Display Network and Facebook Advertising Network; and
    - Search information providers such as Google and Bing.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Identity and Contact Data from data brokers or aggregators.

### **Cookies**

Our websites may use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or mobile device if you agree. Cookies contain information that is transferred to your computer's or mobile device's hard drive.

We may use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas of our websites.
- Analytical/performance cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our websites when they are using it. This helps us to improve the way our websites work, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognize you when you return to our websites. This enables us to personalize our content for you, and remember your preferences.
- Targeting cookies. These cookies record your visit to our websites, the pages you have visited, and the links you have followed. We may use this information to make our websites, and the material displayed on it, more relevant to your interests. We may also share this information with third parties for this purpose.
- You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

### **How we may use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we may use your personal data in the following circumstances:

- Where we need to perform the services that you use through our websites, which may be considered performance of a contract with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we may obtain your consent before sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

### **Purposes for which we may use your personal data**

We may use your personal data for a variety of reasons, both to provide services to you as user of our websites and otherwise.

Among other things, we may use your personal data to register you as a new user, to deliver and provide services to you, to collect and manage payments from you, to manage our relationship with you, to test and administer our websites, for data analysis to improve our websites, products and services, and to deliver relevant website and advertisement content to you.

For each use of your personal data, we will ensure that there is a legal basis for such use. Such bases include, among other things, our performance of services to you (fulfillment of a contract with you), our legitimate interests, and our compliance with legal obligations. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- Promotional offers from us. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased or services from us and you have not opted out of receiving that marketing.

- Third-party marketing. We will get your express opt-in consent before we share your personal data with any unaffiliated third party for marketing purposes.
- Opting out. You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

### **Change of purpose**

We will use your personal data only for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Disclosures of your personal data**

We may share your personal data with the parties set out below:

- Third parties, such as service providers who provide data or payment processing services and IT and system administration services and professional advisers including lawyers, bankers, auditors and insurers, who provide consultancy, banking, legal, insurance and accounting services.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- Law enforcement, judicial or similar officers, to comply with legal requirements, court orders, or investigations.
- Entities managed and/or branded by, or under common control with, Casetta Group.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our unaffiliated third-party service providers to use

your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data retention**

How long will you use my personal data for?

We will retain your personal data only for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Such rights may include the right to:

- Request access to your personal data.
- Request deletion of your personal data.
- Correct your personal data.
- Object to processing of your personal data.
- Request that your personal data be transferred to another person.
- Request restriction of processing your personal data.
- Withdraw your consent to the processing of your personal data.

If you wish to exercise any of the rights set out above, please contact us.

California Civil Code Section § 1798.83 permits users of our websites that are California residents to request certain information regarding our disclosure of their personal to third parties for their direct marketing purposes. To make such a request, please contact us.

## **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may (a) charge a reasonable fee, or (b) refuse to comply with your request, if your request is clearly unfounded, repetitive, or excessive, to the extent permitted by law.

## **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**Contact Information**

To ask questions or comment about this privacy policy and our privacy practices.