

# Bōde Privacy Policy

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## 1. INTRODUCTION

Thank you for using Bōde! Your trust is important to us and we're committed to protecting the privacy and security of your personal information. The information that's shared with us helps us to provide a great experience with Bōde. We are committed to protecting all the personal information we collect and help ensure that personal information is handled properly.

This Privacy Policy describes how we collect, use, process, and disclose your personal information, in conjunction with your access to and use of the Bōde Platform. This privacy policy describes our privacy practices for all websites, platforms and services that link to it. Please read the privacy policy on the applicable site.

### 1.1 Definitions

If you see an undefined term in this Privacy Policy (such as "Listing" or "Bōde Platform"), it has the same definition as in our [Terms and Conditions](#) ("Terms").

## 2. INFORMATION WE COLLECT

There are three general categories of information we collect.

### 2.1 Information You Give to Us.

#### 2.1.1 Information that is necessary for the use of the Bōde Platform.

We ask for and collect the following personal information about you when you use the Bōde Platform. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested services.

- **Account Information.** When you sign up for an Bōde Account, we require certain information such as your first name, last name, email address, and date of birth.
- **Profile Information.** To use certain features of the Bōde Platform we may ask you to provide additional information, which may include your address, phone number, and a profile picture.
- **Identity Verification Information.** To help create and maintain a trusted environment, we may collect identity verification information (such as images of your government issued ID, passport, national ID card, or driving license, as permitted by applicable laws) or other authentication information.
- **Communications with Bōde and other Users.** When you communicate with Bōde or use the Bōde Platform to communicate with other Users, we collect information about your communication and any information you choose to provide.

#### 2.1.2 Information you choose to give us.

You may choose to provide us with additional personal information in order to obtain a better user experience when using Bode Platform. This additional information will be processed based on our legitimate interest or when applicable, your consent.

You may choose to provide us information when you fill in a form, update or add information to your Bode Account, respond to surveys, post to community forums, participate in promotions, communicate with our customer care team, share your experience with us (such as through Host Stories), or use other features of the Bode Platform.

### 2.1.3 Information We Automatically Collect from Your Use of the Bode Platform Services.

When you use the Bode Platform, we automatically collect personal information about the services you use and how you use them. This information is necessary for the adequate performance of the contract between you and us, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the functionalities of the Bode Platform.

- **Geo-location Information.** When you use certain features of the Bode Platform, we may collect information about your precise or approximate location as determined through data such as your IP address or mobile device's GPS to offer you an improved user experience. Most mobile devices allow you to control or disable the use of location services for applications in the device's settings menu. Bode may also collect this information even when you are not using the app if this connection is enabled through your settings or device permissions.
- **Usage Information.** We collect information about your interactions with the Bode Platform such as the pages or content you view, your searches for Listings, and other actions on the Bode Platform.
- **Log Data and Device Information.** We automatically collect log data and device information when you access and use the Bode Platform, even if you have not created an Bode Account or logged in. That information includes, among other things: details about how you've used the Bode Platform (including if you clicked on links to third party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you've viewed or engaged with before or after using the Bode Platform.
- **Cookies and Similar Technologies.** We use cookies and other similar technologies when you use our platform, use our mobile app, or engage with our online ads or email communications. We may collect certain information by automated means using technologies such as cookies, web beacons, pixels, browser analysis tools, server logs, and mobile identifiers. In many cases the information we collect using cookies and other tools is only used in a non-identifiable without reference to personal information. For example, we may use information we collect to better understand website traffic patterns and to optimize our website experience. In some cases we associate the information we collect using cookies and other technology with your personal information. Our business partners may also use these tracking technologies on the Bode Platform or engage others to track your behavior on our behalf.
- **Pixels and SDKs.** Third parties, including Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from our websites and elsewhere on the internet and use that information to provide measurement services and target ads. For apps, that third parties, including Facebook, may collect or receive information from your app and other apps and use that information to provide measurement services and targeted ads. Users can opt-out of the collection and use of information for ad targeting by updating their Facebook account ad settings and by contacting us at [help@bodecanada.com](mailto:help@bodecanada.com) with a description of your request and validation information.

#### 2.1.4 Information We Collect from Third Parties.

Bōde may collect information, including personal information, that others provide about you when they use the Bōde Platform, or obtain information from other sources and combine that with information we collect through the Bōde Platform. We do not control, supervise or respond for how the third parties providing your information process your Personal Information, and any information request regarding the disclosure of your personal information to us should be directed to such third parties.

- **Third Party Services.** If you link, connect, or login to your Bōde Account with a third party service (e.g. Google, Facebook), the third party service may send us information such as your registration, friends list, and profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- **Your References.** If someone has written a reference for you, it will be published on your Bōde public profile page with your consent.
- **Background Information.** Bōde may obtain the local version of police, background or registered sex offender checks. We may use your information, including your full name and date of birth, to obtain such reports.
- **Referrals.** If you are invited to the Bōde, the person who invited you may submit personal information about you such as your email address or other contact information.
- **Other Sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or information to help detect fraud and safety issues, from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results (with your consent where required) or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the Bōde Platform through partnerships, or about your experiences and interactions from our partner ad networks.

### **3. HOW WE USE INFORMATION WE COLLECT**

We may use, store, and process personal information to (1) provide, understand, improve, and develop the Bōde Platform, (2) create and maintain a trusted and safer environment (such as to comply with our legal obligations and ensure compliance with Bōde Policies) and (3) provide, personalize, measure, and improve our advertising and marketing.

#### **3.1 Provide, Improve, and Develop the Bōde Platform.**

We may use the personal information to provide, improve, and develop the Bōde Platform such as to:

- enable you to access and use the Bōde Platform,
- enable you to communicate with other Users,
- operate, protect, improve, and optimize the Bōde Platform and experience, such as by performing analytics and conducting research,
- provide customer service,
- send you service or support messages, updates, security alerts, and account notifications,
- if you provide us with your contacts' information, we may process this information: (i) to facilitate your referral invitations, (ii) send your requests for references, (iii) for fraud detection and prevention, and (iv) for any purpose you authorize at the time of collection,

- to operate, protect, improve, and optimize the Bōde Platform and experience, and personalize and customize your experience

We process this personal information for these purposes given our legitimate interest in improving the Bōde Platform and our experience with it, and where it is necessary for the adequate performance of the contract with you.

### **3.2 Create and Maintain a Trusted and Safer Environment.**

We may use the personal information to create and maintain a trusted and safer environment such as to:

- detect and prevent fraud, spam, abuse, security incidents, and other harmful activity,
- conduct security investigations and risk assessments,
- verify or authenticate information or identifications provided by you (such as to compare your identification photo to another photo you provide),
- conduct checks against databases and other information sources, including background or police checks, to the extent permitted by applicable laws and with your consent where required,
- comply with our legal obligations,
- Resolve any disputes with any of our Users and enforce our agreements with third parties,
- enforce our Terms and Conditions and other policies, and

We process this personal information for these purposes given our legitimate interest in protecting the Bōde Platform, to measure the adequate performance of our contract with you, and to comply with applicable laws.

### **3.3 Provide, Personalize, Measure, and Improve our Advertising and Marketing.**

We may use the personal information to provide, personalize, measure, and improve our advertising and marketing such as to:

- send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences (including information about Bōde or partner campaigns and services) and social media advertising through social media platforms such as Facebook or Google),
- personalize, measure, and improve our advertising,
- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Bōde or its third party partners,
- conduct profiling on your characteristics and preferences (based on the information you provide to us, your interactions with the Bōde Platform, information obtained from third parties, and your search and booking history) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you,
- enrolling in an email subscription will not affect the frequency of administrative emails that we may send in connection with any Bōde Account. No fee is charged for sending promotional emails to you, but third-party data rates may apply. Note that you may not be able to take advantage of certain promotions if you do not have an Bōde Account, and
- invite you to events and relevant opportunities

We will process your personal information for the purposes listed in this section given our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest.

### **3.4 Your Choices**

You have choices on the promotional messages that you choose to receive.

- You can limit the information you provide to Bōde. Participation in promotions and marketing programs is voluntary.
- You can limit the communications that Bōde sends to you.
  - To opt-out of marketing emails, simply click the link labeled “unsubscribe” at the bottom of any marketing email we send you or access the notification settings in your Bōde Account.
  - You can always update your notification settings within your Bōde Account by visiting the Notifications section of your Bōde Account. Please note that even if you opt-out of marketing communications, we may still need to contact you with important information about your account. For example, even if you opt-out of emails, we may still send you activity confirmations or fraud alerts.

## **4. SHARING & DISCLOSURE**

### **4.1 Advertising and Social Media; Sharing With Your Consent.**

Where permissible according to applicable law we may use certain limited personal information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, to generate leads, drive traffic to our websites or otherwise promote our products and services on the Bōde Platform. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest.

The social media platforms with which we may share your personal information are not controlled or supervised by Bōde. Therefore, any questions regarding how your social media platform service provider processes your personal information should be directed to such provider.

Please note that you may, at any time ask Bōde to cease processing your data for these direct marketing purposes by updating your notification preferences in your account.

### **4.2 Profiles, Listings, and other Public Information.**

The Bōde Platform lets you publish information, including personal information, that is visible to the general public. For example:

- Listing pages are publicly visible and include information such as the Listing precise location, Listing description, calendar availability, aggregated demand information (like page views over a period of time), and any additional information you choose to share.
- If you submit content in a community or discussion forum, blog or social media post, or use a similar feature on the Bōde Platform, that content is publicly visible.

Based on our legitimate interest to promote the Bōde Platform we may display parts of the Bōde Platform (e.g., your Listing page) on sites operated by Bōde’s business partners, using technologies such as widgets or APIs.

### **4.3 Compliance with Law, Responding to Legal Requests, Preventing Harm and Protection of our Rights.**

Bōde may disclose your information, including personal information, to courts, law enforcement, governmental authorities, tax authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or if such disclosure is reasonably necessary: (i) to comply with our legal obligations, (ii) to comply with legal process and to respond to claims asserted against Bōde, (iii) to respond to valid requests relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability, (iv) to enforce and administer our Terms of Service or (v) to protect the rights, property or personal safety of Bōde, its employees, its Users, or Users of the public.

These disclosures may be necessary to comply with our legal obligations, for the protection of your or another person's vital interests or for the purposes of our or a third party's legitimate interest in keeping the Bōde Platform secure, preventing harm or crime, enforcing or defending legal rights, facilitating the collection of taxes and prevention of tax fraud or preventing damage.

Where appropriate, we may notify Users about legal requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon Bōde's property, its Accounts and the Bōde Platform. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that User about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

#### **4.4 Service Providers.**

Bōde uses a variety of third-party service providers to help us provide services related to the Bōde Platform.

For example, service providers may help us: (i) verify your identity or authenticate your identification documents, (ii) check information against public databases, (iii) conduct background or police checks, fraud prevention, and risk assessment, (iv) perform product development, maintenance and debugging, (v) allow the provision of the Bōde Services through third party platforms and software tools (e.g. through the integration with our APIs), (vi) or pull property title. These providers have limited access to your personal information to perform these tasks on our behalf, and are contractually bound to protect the personal information and only use the personal information in accordance with our instructions .

Bōde will need to share your information, including personal information, in order to ensure the adequate performance of our contract with you.

#### **4.5 Business Transfers.**

If Bōde undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred and becomes subject to a different privacy policy.

#### **4.6 Aggregated Data.**

We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, research, demographic profiling, marketing and advertising, and other business purposes.

## **5. YOUR RIGHTS**

You may exercise any of the rights described in this section at [help@bodecanada.com](mailto:help@bodecanada.com). Please note that we may ask you to verify your identity and request before taking further action on your request.

### **5.1 Managing Your Information.**

You may access and update some of your information through your Account settings. If you have chosen to connect your Bōde Account to a third-party application, like Facebook or Google, you can change your settings and remove permission for the app by changing your Account settings. You are responsible for keeping your personal information up-to-date.

### **5.2 Rectification of Inaccurate or Incomplete Information.**

You have the right to ask us to correct inaccurate or incomplete personal information about you (and which you cannot update yourself within your Bōde Account).

### **5.3 Data Access and Portability.**

Applicable law may entitle you to request copies of your personal information held by us. You may also be entitled to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

### **5.4 Data Retention and Erasure.**

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. In certain jurisdictions, you can request to have all your personal information deleted entirely. Please note that if you request the erasure of your personal information:

- We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if we suspend a Bōde Account for fraud or safety reasons, we may retain certain information from that Bōde Account to prevent that Subscriber from opening a new Bōde Account in the future.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, Bōde may keep some of your information for tax, legal reporting and auditing obligations.
- Information you have shared with others (e.g., Reviews, forum postings) may continue to be visible on the Bōde Platform, even after your Bōde Account is cancelled. However, attribution of such information to you will be removed. Additionally, some copies of your information (e.g., log records) may remain in our database, but are disassociated from personal identifiers.
- Because we maintain the Bōde Platform to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

### **5.5 Withdrawing Consent and Restriction of Processing.**

If we are processing your personal information based on your consent you may withdraw your consent at any time by changing your Account settings or by sending a communication to Bōde

specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.

### **5.6 Lodging Complaints.**

You have the right to lodge complaints about our data processing activities by filing a complaint with by the filling out the appropriate form in the “Contact Us” section of the Bōde Platform.

## **6. SECURITY**

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, and information access controls. If you know or have reason to believe that your Bōde Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Bōde Account, please contact us following the instructions in the “Contact Us” section of the Bōde Platform.

## **7. CHANGES TO THIS PRIVACY POLICY**

Bōde reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the Bōde Platform and update the “Last Updated” date at the top of this Privacy Policy. We will also provide you with notice of the modification by email at least thirty (30) days before the date they become effective. If you disagree with the revised Privacy Policy, you may cancel your Account. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of the Bōde Platform will be subject to the revised Privacy Policy.

## **8. CONTACT US**

If you have any questions or complaints about this Privacy Policy or Bōde’s information handling practices, you may fill out the appropriate form in the “Contact Us” section of the Bōde Platform.

BY AGREEING TO USE THE WEBSITE, YOU ACKNOWLEDGE THAT YOU HAVE READ THIS PRIVACY STATEMENT, UNDERSTAND IT AND AGREE TO ALL THE TERMS AND CONDITIONS IN THIS PRIVACY STATEMENT.