

## Roambird - Privacy Policy

Roambird, Inc., domiciled in 12 E 49th St, New York, NY, 10017 (the “Company”) takes the users (“Users”) privacy very seriously. The purpose of this “Privacy Policy” is to explain Users how Roambird may collect, retain, process, share and transfer Users personal information in order to provide its Services through the website: [www.roambird.co](http://www.roambird.co).

For the purposes of this Privacy Policy, Users shall be natural (human) persons that request Roambird’s services.

By providing Roambird with their personal data through the Website, Users expressly consent the fact that Roambird may process such data in accordance with the terms of this Privacy Policy and for the purposes set forth herein.

Users must read this Privacy Policy before registering or using the Services in the Website. By clicking on the “register” button, Users state that they have read this Privacy Policy and expressly agree to it. In no event Roambird will collect Personal Information from Users without consent and its not voluntarily given by them.

Roambird reserves the right, at Roambird’s discretion, to change this Privacy Policy from time to time to reflect changes to Roambird’s business or services, or applicable laws. For that purpose, Roambird will provide Users with thirty (30) days prior notice for any modification on the Privacy Policy page of Roambird’s Website. Roambird also may notify Users about the modifications using a contact information, email or other means of contact if provided by Users. The revised Privacy Policy will be effective as of the publication date. Users may contact Roambird if they have questions about Roambird’s privacy practices that are not addressed in this Privacy Policy.

Users agree to provide true and accurate data. Furthermore, they shall be solely responsible for any loss or damage that may be suffered by Roambird or any of its subsidiaries or third parties as a result of the information provided being false, inaccurate, out of date or not genuine.

Roambird respects and is in a constantly effort to be in compliance with the European General Data Protection Regulation 2016/679 (“GDPR”) to protect, warrant and preserve the rights to Users to may eventually apply to or be served.

### 1. Who is the Controller in relation to the Personal Information Provided by Users?

All Personal Information provided or collected through the Website will be processed by Roambird, whose contact information can be found below, as file controller.

Identity: Roambird, Inc

Postal address: 12 E 49th St, New York, NY, 10017

Telephone no.: +1 631 377 0718

Contact Form: [support@roambird.co](mailto:support@roambird.co)

## 2. About the Website and Services

Roambird facilitates Users the organization of their trips (the “Service” or “Services”). The focus is on helping Users to find Activities, Accommodations and Meals in different destinations and to facilitate the booking of such recreations through a set of questions. Roambird does not offer any guide, tour or touristic services, Roambird just provides Users a Website where they can plan their trips.

The User understands and accepts that any concept not defined in this document may be defined in the Terms and Conditions of Service complementary to this Privacy Policy.

### A) What Information Does Roambird collect and how is it collected?

Roambird processes personal information of Users to offer its Service (“Personal Information”).

In general, User’s and Guide’s Personal Information shall include: email, first and last name, local ID and it’s photo. Particularly, Roambird may collect the following information:

Registration and use information – When Users use the Services by establishing an account through Google (“Account”), Roambird will collect Personal Information as necessary to offer the Activities, Accommodations and Meals to Users. Roambird may require Users to provide Roambird with the following Personal Information: email, first and last name, local ID and it’s photo. Roambird reserves the right to require Users to provide additional Personal Information.

Trip Information: When Users use the Service to optimize their travel, Roambird may require Users to provide Roambird with information regarding their future trips. Particularly, Roambird may collect information about: the destination, currency, amount of days, starting and ending dates of the trip, ID, language, the results of the itinerary offered by Roambird, User’s location and timezone, browser, initial referer.

Additional information that the Users wants to share: information that Users provide to Roambird with other purposes. For example, a photograph or a tiktok in order to be published in Roambird’s social networks.

Information about the communications made with Roambird : Roambird will have access to information that Users provide for the resolution of doubts or complaints about the use of the Website, when Users make such claims through [support@roambird.co](mailto:support@roambird.co).

Non-Identifying Information: Roambird also may collect other information, such as zip codes, demographic data, information regarding the User use of the Service, and general project-related data (“Non-Identifying Information”). Roambird may aggregate information collected from Roambird registered and non-registered users. In some cases, Roambird may render Personal Data (generally, email address) into a form of non-identifying information referred to in this Privacy Policy as “Hashed Information.” This is typically accomplished using a mathematical process (commonly known as a hash function) to convert information into a code. The code does not identify the User directly, but it may be used to connect the User activity and interests in the WebSite.

Information Received from Third Parties

Third parties may also provide Roambird with information about the User. If Roambird combines such information with information about the User collected through the Service or the Website, Roambird will still process that combined information as set forth in this Privacy Policy.

#### Information Collected Automatically

Like other online companies, Roambird receives technical information when the User uses the Website or the Services. Roambird uses these technologies to analyze how Users use the Service, to improve the Website, to save the User log-in information for future sessions, and to serve the User with advertisements that are of it's interest.

Roambird and its third party service providers, including analytics and third party content providers, may automatically collect certain information from the User whenever the User accesses or interacts with the Service or Website. This information may include, among other information, the browser and operating system the User is using, the search terms the User entered into a search engine that led the User to the Service, areas within the Service that the User visited, which links the User clicked on, which pages or content the User viewed and for how long, other similar information and statistics about the User's interactions, such as content response times, download errors and length of visits to certain pages and other information commonly shared when browsers communicate with websites. Roambird does this in order to improve Roambird Services, and to improve the Website.

In order to perform the Service, the Website may use cookies, tracking pixels and related technologies. Cookies are small data files that are served by the Website. They enable Roambird to identify Users when they use and navigate through the Website in order to serve targeted advertising of Roambird and services to Users.

#### B) What Privacy Choices Are Available To Users ?

Users have choices to the privacy practices and communications described in this Privacy Policy.

Choices Relating to the Personal Information Roambird Collect. Personal Information. Users may decline to provide Personal Information, but certain Services or all of the Services may be unavailable to Users.

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Choices Relating to Cookies. Users may have options available to manage cookies preferences. For example, Users browser or internet device may allow Users to delete, disable, or block certain cookies and other tracking technologies. Users may choose to enable these options, but doing so may prevent Users from using many of the core features and functions of the Service and to relegate a better experience. Users may have an option regarding the use of cookies and other tracking technologies when they visit the Website. For example, Users may

be asked if they want the Service or the Website to “remember” certain things about them, and Roambird will use cookies and other tracking technologies to the extent that Users permit them

Choices Relating to Registration and Account Information. Users have an Account, which he/she/it registers through his/her/it’s google email. User may review and edit it’s Personal Information through it’s Google’s account. User understands and agrees that Roambird does not have any influence over the modification of the User's google account information.

Choices Relating to Communication. Notices, Alerts and Updates from Roambird :

Marketing: Roambird may send to Users marketing content about Roambird, the Website and the Service, as well as the products and services of unaffiliated third parties through various communication channels, for example, email. Users may opt out of these marketing communications by following the instructions in the communications they receive.

Informational and Other: Roambird will send communications to Users that are required or necessary to send to Users regarding the Service, notifications that contain important information and other communications that Users request from Roambird .

C) For What Purpose is the Personal Information Collected?

Roambird has no interest in retaining Personal Information about Users for any other purpose than the effectiveness of its Service. Roambird may retain Personal Information to fulfill Roambird ’s legal obligations and for Roambird ’ business purposes. Roambird may retain Personal Information for longer periods than a year and a half. Roambird shall only retain Personal Information for legitimate business interests.

In case Roambird needs to close an Account, Roambird may take steps to mask Personal Information and other information, but Roambird reserves the possibility to retain and access the data for so long as required to comply with applicable laws. Roambird will continue to use and disclose such Personal Information in accordance with this Privacy Policy.

Roambird collects, processes and discloses Users personal data only for specific and limited purposes. For example, to provide the Service, to assess and handle any complaints, to develop and improve the Service, communication methods and the functionality of the Website, to provide personalized services and to communications and targeted advertising to Users.

Roambird collects, process and discloses Users Personal Information for the following purposes:

To execute the proposed Services on the Website;

To provide Users with their order status, deal with their enquiries and requests, and assess and handle any complaints;

To process and answer Users inquiries or to contact them to answer their questions and/or requests;

To develop and improve the Service, communication methods and the functionality of the Website;

To communicate information to Users and to manage Users registration and/or subscription to Roambird newsletter or other communications;

To authenticate the identity of individuals contacting Roambird by telephone, electronic means or otherwise;

To understand and assess the interests, wants, and changing needs of consumers, to improve the Website, current services, and/or developing new services;

To provide personalized services, communications and targeted advertising as well as services recommendations to Users;

For direct marketing purposes.

To manage risk and protect the Website, the Service, Users from fraud by verifying Roambird 's and Users identity, and helping to detect and prevent fraud and abuse of the Website or Services.

To manage Roambird 's business needs, such as monitoring, analyzing, and improving the Services and the Website performance and functionality.

To comply with Roambird 's obligations and to enforce the terms of Roambird 's Website and Services, including to comply with all applicable laws and regulations. Roambird will recommend and encourage Users to comply with all applicable regulations regarding data privacy in all applicable jurisdictions.

If Roambird 's ownership changes or the majority of its assets are acquired by a third party, Users are informed that Roambird will transfer their data to the acquiring organizations in order to continue to provide the Service subject to the processing of data. The new file controller will inform Users of its identification data. Roambird states that it will comply with its duty of information to the relevant supervisory authority in the event of such circumstances arising, and it shall inform Users of the change of file controller if and when this happens.

Roambird may share their personal data to third parties associated with Roambird, provided that the Users have given their express informed and unequivocal consent for it and is aware of the purpose and recipient of such transfer.

#### D) Profiling

Roambird uses Users Personal Information to build profiles. Roambird creates profiles by analyzing the information about Users online surfing, searching and booking behavior and their interactions with Roambird brand communications by building segments (creating groups that have certain common characteristics) and by placing Users personal data in one or more segments. These segments are used by Roambird to personalize the Website and Roambird communications to Users (such as showing relevant content to them when they use Service or in a newsletter to them), and to display relevant offers and advertisements on the Website. Roambird profiles the Personal Information where Users have provided consent for Roambird to do so (for example, accepting the Privacy Policy, accepting the setting of cookies on their browser online or signing up for Roambird email newsletters).

Users can withdraw their consent to prevent their Personal Information being used this way at any time by unsubscribing to the use of their email address if they have signed up to any marketing newsletters.

#### E) Do We Share/Transfer Personal Information?

Only for the purposes stated in this Privacy Policy and to perform the Service, Personal Information may be disclosed by Roambird, when necessary, to authorities, other companies within the same Roambird affiliates, Roambird's partners and to other third parties, such as third party service providers used in connection with Roambird Service and services related thereto.

Roambird may also share non-identifying information with third parties. The User has choices as to whether Roambird share the User personal information with third parties.

Roambird may share aggregated non-identifying information and Roambird may otherwise disclose non-identifying information (including, without limitation, Hashed Information) to third parties. Roambird do not share the User Personal Data with third parties for those third parties' marketing purposes unless Roambird first provide the User with the opportunity to opt-in to or opt-out of such sharing.

Roambird may also share the information Roambird have collected about the User, including Personal Data, as disclosed at the time the User provides it's Personal Data, with the User consent, as otherwise described in this Privacy Policy, or in the following circumstances:

**Service Providers:** Roambird may employ third party companies and individuals to facilitate the Service, to provide the Service on Roambird's behalf, to perform Service-related services (e.g., without limitation, maintenance services, database management, web analytics and online advertising, payment processing, fraud detection and improvement of Roambird's features) or to assist Roambird in analyzing how the Service is used. These third parties may have access to the User Personal Data in order to perform these tasks on Roambird's behalf.

**Legal and Investigative Purposes:** Roambird will share information with government agencies as required by law in response to lawful requests by public authorities, including to meet national security or law enforcement requirements and, including without limitation, in connection with reporting earnings. Roambird cooperates with government and law enforcement officials and private parties to enforce and comply with the law. Roambird will disclose information about the User to government or law enforcement officials or private parties as Roambird, in Roambird's sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), or, at the request of governmental authorities or other third parties conducting an investigation where Roambird determine in Roambird's sole discretion the disclosure is necessary to (a) protect the property and rights of Roambird or a third party, (b) protect the safety of the public or any person, or (c) prevent or stop activity Roambird may consider to be, or pose a risk of being, illegal, fraudulent, unethical or legally actionable activity.

**Internal and Business Transfers:** Roambird may share information, including Personal Data, with any current or future subsidiaries or affiliates, primarily for business and operational

purposes, including activities such as IT management, for them to provide services to the User, or support and supplement the Services Roambird provides. Roambird may sell, transfer, or otherwise share some or all of Roambird's assets, including the User personal data, in connection with a merger, acquisition, reorganization or sale of assets (including, in each case, as part of the due-diligence process with any potential acquiring entity) or in the event of bankruptcy.

Because Roambird is a U.S. company, Roambird process and store the User information in the United States and Roambird's service providers may process and store it elsewhere.

Roambird is a U.S. company. If the User are located outside the United States and choose to provide information to Roambird, Roambird transfers Personal Data to the United States for processing, and Roambird's service providers may process Personal Data in the United States and elsewhere. These countries may not have the same data protection laws as the country in which the User initially provided the information. When Roambird transfers the User information to the United States, Roambird will protect it as described in this Privacy Policy.

The Service is managed by Roambird's team at its headquarters in Delaware, United States. Roambird relies on service providers to operate the WebSite and provide the Services. These service providers are all located in and process the User's data in the United States. Roambird does not currently market its Services to individuals or businesses outside of the United States.

In some cases, Personal Information may be transferred outside the European Union and the European Economic Area ("EU/EEA"), including but not limited to, the United States of America. Roambird will only send Personal Information collected within the EEA to foreign countries in circumstances such as (i) to follow Users instructions, (ii) to comply with a legal duty or, (iii) to work with the Users or other touristic service providers who propose tours on the Website.

In such case, such transfers outside the EEA will be performed subject to appropriate safeguards and safety measures such as standard data protection clauses adopted in respective agreements or otherwise approved by the EU Commission in accordance with the GDPR.

#### F) How Do We Protect Users' Personal Information?

Roambird maintains technical, physical, and administrative security measures designed to provide reasonable protection for Users Personal Information against loss, misuse, unauthorized access, disclosure, interference and alteration. The security measures include information access authorization controls. Nevertheless, considering the actual online environment is not fully secured, Roambird shall not guarantee that security measures taken will prevent illegally and maliciously operating third parties from obtaining access to Users Personal Information and the absolute security of that information during its transmission or its storage on Roambird systems. While Roambird is dedicated to securing its systems, the Website and Services, Users are responsible for securing and maintaining the privacy of their password(s) and Account, registration information and verifying that the Personal Information Roambird maintains about the Users is accurate and current. Access to Users Personal Information is only

permitted among our employees and agents on a need-to-know basis and subject to strict contractual confidentiality obligations when processed by third-parties.

As mentioned above, Roambird has taken the necessary steps recommended by the European Commission and the competent authority to maintain the required security level, according to the nature of the personal data processed and the circumstances of the processing, in order to avoid, to the extent possible and always in accordance with the state of the art, its alteration, loss or unauthorized access or processing.

#### G) Which are the Users' Rights?

Roambird respects the rights of the Users with regard to the protection of personal data. To this end, the User understands and accepts that he/she has the following rights:

The right to be informed. Users have the right to be provided with clear, transparent and easily understandable information about how Roambird uses their Personal Information and their rights. Therefore, Roambird is providing them with the information in this policy.

The right to access and rectification. Users have the right to access, correct or update their Personal Information at any time. Users understand that any information related to the Account in regard to the modification of User's data, shall be required to Google LLC, organized under the laws of the State of Delaware, USA, domiciled in 1600 Amphitheatre Parkway, Mountain View, California 94043, United States of America.

The right to data portability. The personal data Users have provided to Roambird is portable. This means it can be moved, copied or transmitted electronically under certain circumstances.

The right to be forgotten. Under certain circumstances, Users have the right to request that Roambird delete their data. If Users wish to delete the Personal Information Roambird holds about them, please let Roambird know and Roambird will take reasonable steps to respond to the request in accordance with legal requirements. If the Personal Information Roambird collect is no longer needed for any purposes and Roambird are not required by law to retain it, Roambird will do what they can to delete, destroy or permanently de-identify it.

The right to restrict processing. Under certain circumstances, Users have the right to restrict the processing of their Personal Information.

The right to object. Under certain circumstances, Users have the right to object to certain types of processing, including processing for direct marketing (i.e., receiving emails from Roambird notifying them or being contacted with varying potential opportunities).

The right to withdraw consent. If Users have given their consent to anything Roambird does with their personal information, they have the right to withdraw their consent at any time (although if they do so, it does not mean that anything Roambird has done with their Personal Information with their consent up to that point is unlawful). Users can withdraw their consent to the processing of their Personal Information at any time by contacting Roambird with the details provided below.

Personal Information subjects may exercise the aforementioned rights by sending a written request to Roambird at [support@roambird.co](mailto:support@roambird.co).



In case Users consider that its rights under the data protection laws are infringed, Users may file a complaint with the supervisory authority of the Users residence. As an example for Europe, Data Protection authorities are independent public authorities that supervise, through investigative and corrective powers, the application of the data protection law. They provide expert advice on data protection issues and handle complaints lodged against violations of the General Data Protection Regulation (GDPR) and the relevant national laws. There is one in each EU Member State. Generally speaking, the main contact point for questions on data protection is the Data Protection authority in the EU Member State where User or Company is based. To find the proper authority User or Company may enter the following link: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

#### H) Retention of Personal Information.

Roambird will keep Users' Personal Information retained for [3] years. The Personal Information may also be retained so that Roambird can continue to improve Users experience through the Service. . Roambird will actively review the hold Personal Information and delete it securely, or in some cases anonymize it, when there is no longer a legal, business or consumer need for it to be retained.

#### I) Links to other WebSites

The WebSite contains links to other websites. If the User chooses to click on a third party link, the User will be directed to that third party's website. The fact that Roambird link to a website is not an endorsement, authorization or representation of Roambird's affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. Roambird does not exercise control over third party websites. These other websites may place their own cookies or other files on the User computer, collect data or request Personal Data from the User. Roambird encourages the User to read the privacy policies or statements of the other websites the User visits.

#### K) Shared Information

Roambird restricts access to the User's information to authorized employees and contractors and only shares the User's personal information with third parties in the following circumstances.

Other Service Providers, Users, Contractors or Vendors: for providing the Service with accountants, for analytics and reporting, marketing and advertising, auditing, communicating with the User, managing Roambird's customer database, providing the User with reservation services or trip information services through third party websites.

### 3. Changes to this Privacy Notice

Changes to this Privacy Policy will be posted on this page. If Roambird makes a material change to Roambird ' privacy practices, Roambird will provide notice on the Website and by other contact information User or Users have provided.

### 4. Governing law. Disputes

This Privacy Policy shall be governed by the law of Delaware, United States. Any conflict arising from the interpretation or execution of the current Privacy Policy or for any other cause will be submitted to Delaware's applicable laws and to the exclusive jurisdiction of the courts of the judicial district of Delaware, United States.

#### 5. Contact Us

If Users have any questions or concerns regarding Roambird ' Privacy Policy, please contact Roambird . All contacts and inquiries related to this Privacy Policy should be addressed to [support@roambird.co](mailto:support@roambird.co).

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