

Privacy Policy

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This Privacy Policy describes how GRA Sp. z o.o. and its affiliates (“we,” “us,” or “Karta”), process personal information that we collect through the Karta Platform. Depending on where you live and what you are doing on the Karta Platform, the supplemental privacy pages listed below may apply to you. Please follow the links and review the supplemental information provided there with information about how we process personal information for those regions and services.

1. DEFINITIONS

Undefined terms in this Privacy Policy have the same definition as in our Terms of Service (“Terms”).

2. PERSONAL INFORMATION WE COLLECT

2.1 Information needed to use the Karta Platform.

We collect personal information about you when you use the Karta Platform. Without it, we may not be able to provide you with all services requested. This information includes:

- **Contact Information, Account, Profile Information.** Such as your first name, last name, phone number, postal address, email address, date of birth, and profile photo, some of which will depend on the features you use.
- **Identity Verification and Payment Information.** Such as images of your government issued ID (as permitted by applicable laws), your ID number or other verification information, bank account or payment account information.

2.2 Information you choose to give us.

You can choose to provide us with additional personal information. This information may include:

- **Additional Profile Information.** Such as gender, preferred language(s), city, and personal description. Some of this information as indicated in your account settings is part of your public profile page and will be publicly visible.
- **Address Book Contact Information.** Address book contacts you import or enter manually.
- **Other Information.** Such as when you fill in a form, add information to your account, respond to surveys, post to community forums, participate in promotions, communicate with our customer care team and other Members, or share your experience with us. This may include health information if you choose to share it with us.

2.3 Information Automatically Collected by Using the Karta Platform and our Payment Services.

When you use the Karta Platform and Payment Services, we automatically collect personal information. This information may include:

- **Geo-location Information.** Such as precise or approximate location determined from your IP address or mobile device's GPS depending on your device settings. We may also collect this information when you're not using the app if you enable this through your settings or device permissions.
- **Usage Information.** Such as the pages or content you view, searches for Listings, bookings you have made, and other actions on the Karta Platform.
- **Log Data and Device Information.** Such as details about how you've used the Karta 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 Karta Platform. We may collect this information even if you haven't created an Karta account or logged in.
- **Cookies and Similar Technologies as described in our Cookie Policy.**
- **Payment Transaction Information.** Such as payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, PayPal email address, IBAN information, your address and other related transaction details.

2.4 Personal Information We Collect from Third Parties.

We collect personal information from other sources, such as:

- **Third-Party Services.** If you link, connect, or login to the Karta Platform with a third party service (e.g. Google, Facebook, WeChat), you direct the service to send us information such as your registration, friends list, and profile information as controlled by that service or as authorized by you via your privacy settings at that service.
- **Background Information.** For Members in the United States, to the extent permitted by applicable laws, we may obtain reports from public records of criminal convictions or sex offender registrations. For Members outside of the United States, to the extent permitted by applicable laws and with your consent where required, we 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.
- **Enterprise Product Invitations and Account Management.** Organizations that use our Enterprise products may submit personal information to facilitate account management and invitations to use enterprise products.
- **Referrals and co-travelers.** If you are invited to the Karta Platform such as a co-traveler on a trip, the person who invited you can 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 references, 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 or fraud warnings from identity verification service providers for use in our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the Karta Platform, or about your experiences and interactions from our partners. We

may receive health information, including but not limited to health information related to contagious diseases.

3. HOW WE USE INFORMATION WE COLLECT

3.1 Provide, Improve, and Develop the Karta Platform. We use personal information to:

- enable you to access the Karta Platform and make and receive payments,
- enable you to communicate with other Members,
- perform analytics, debug and conduct research,
- provide customer service,
- send you messages, updates, security alerts, and account notifications,
- if you provide us with your contacts' information such as your friends or co-travellers, we may process this information: (i) to facilitate your referral invitations, (ii) to share your trip details and facilitate trip planning, (iii) for fraud detection and prevention, and (iv) to facilitate your requests or for any other purpose you authorize,
- personalize and customize your experience based on your interactions with the Karta Platform, your search and booking history, your profile information and preferences, and other content you submit, and
- enable your use of our enterprise products.

3.2 Create and Maintain a Trusted and Safer Environment. We use personal information to:

- detect and prevent fraud, spam, abuse, security and safety incidents, and other harmful activity,
- study and combat discrimination consistent with our Nondiscrimination Policy,
- conduct security investigations and risk assessments,
- verify or authenticate information provided by you,
- conduct checks against databases and other information sources, including background or police checks,
- comply with our legal obligations, protect the health and well-being of our Guests, Hosts, Hosts' employees and members of the public,
- resolve disputes with our Members,
- enforce our agreements with third parties,
- comply with law, respond to legal requests, prevent harm and protect our rights (see section 4.5)
- enforce our Terms and other policies (e.g. Nondiscrimination Policy), and
- in connection with the activities above, we may conduct profiling based on your interactions with the Karta Platform, your profile information and other content you submit to Karta, and information obtained from third parties. In limited cases, automated processes could restrict or suspend access to the Karta Platform if such processes detect activity that we think poses a safety or other risk to Karta, our community, or third parties. If you would like to challenge the decisioning based on the automated process, please contact us via the Contact Information section below.

3.3 Provide, Personalize, Measure, and Improve our Advertising and Marketing. We may use personal information to:

- send you promotional messages, marketing, advertising, and other information based on your preferences and social media advertising through social media platforms,
- personalize, measure, and improve our advertising,
- administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Karta or its third-party partners,
- analyze characteristics and preferences to send you promotional messages, marketing, advertising and other information that we think might be of interest to you, and
- invite you to events and relevant opportunities.

3.4 Provide Payment services. Personal information is used to enable or authorize third parties to use Payment Services:

- Detect and prevent money laundering, fraud, abuse, security incidents.
- Conduct security investigations and risk assessments.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce the Payment Terms and other payment policies.
- With your consent, send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences.
- Provide and improve the Payment Services.

4. SHARING & DISCLOSURE

4.1 Sharing With Your Consent or at Your Direction.

Where you provide consent, we share your information as described at the time of consent, such as when authorizing a third-party application or website to access your Karta account or participating in promotional activities by Karta partners or third parties.

Where permissible with applicable law, we may use certain information about you, such as your email address, de-identify it, and share it with social media platforms, to generate leads, drive traffic to Karta or otherwise promote our products and services.

4.2 Sharing Between Members.

To help facilitate bookings or other interactions between Members, we may need to share certain information such as:

- When a booking request is made or dispute is submitted, certain information may be shared between Guest(s) and Host(s), including profile, name, names of any additional Guests, cancellation history, review information, age of guest (unless prohibited by applicable law), dispute outcome (when applicable) and other information you choose to share and submit. When a booking is confirmed, additional information is shared to assist with coordinating the trip, like profile photo and phone number. When you as a Host have a confirmed booking,

certain information is shared with the Guest (and the additional Guests they invite, if applicable) to coordinate the booking, such as your profile, full name, phone number, and Listing address.

- When you as a Host invite another Member to host with you, you authorize that person to access and update your information and Member Content, including but not limited to certain information like your full name, phone number, Accommodation address, calendar, Listing information, Listing photos, and email address.
- When you as a Guest invite additional Guests to a booking, your full name, travel dates, Host name, Listing details, the Accommodation address, and other related information will be shared with each additional Guest.

4.3 Information You Publish in Profiles, Listings, and other Public Information.

You can make certain information publicly visible to others, such as:

- Your public profile page, which includes your profile photo, first name, description, and city.
- Listing pages that include information such as the Accommodation or Experience's approximate or precise location description, calendar availability, profile photo, aggregated demand information (like page views over a period of time), and additional information you choose to share.
- Reviews, ratings and other public feedback.
- Content in a community or discussion forum, blog or social media post.

We may display parts of your public profile and other Content you make available to the public like Listing details on third-party sites, platforms and apps.

Information you share publicly on the Karta Platform may be indexed through third-party search engines. In some cases, you may opt-out of this feature in your account settings.

4.4 Host Service Providers.

Hosts may use third-party services to help manage or deliver their services, such as cleaning services or lock providers. Hosts may use features on the Karta Platform to share information about the Guest (like check-in and check-out dates, Guest name, Guest phone number) with such third-party service providers.

4.5 Complying with Law, Responding to Legal Requests, Preventing Harm and Protecting our Rights.

We may disclose your information to courts, law enforcement, governmental or public authorities, tax authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or where disclosure is reasonably necessary: (i) to comply with our legal obligations, (ii) to comply with a valid legal request or to respond to claims asserted against Karta, (iii) to respond to a valid legal request relating to a criminal investigation to address alleged or suspected illegal activity, or to respond to or address any other activity that may expose us, you, or any other of our users to legal or regulatory liability, (iv) to enforce and administer our agreements with Members, or (v) to

protect the rights, property or personal safety of Karta, its employees, its Members, or members of the public. For example, if permitted due to the forgoing circumstances, Host tax information may be shared with tax authorities or other governmental agencies.

Where appropriate, we may notify Members 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 or harm to Karta, our Members, or expose Karta to a claim of obstruction of justice.

For jurisdictions where Karta facilitates the collection and remittance of Taxes where legally permissible according to applicable law, we may disclose Hosts' and Guests' information about transactions, bookings, Accommodations and occupancy Taxes to the applicable tax authority, such as Host and Guest names, Listing addresses, transaction dates and amounts, tax identification number(s), the amount of taxes received (or due) by Hosts from Guests, and contact information.

In jurisdictions where Karta facilitates or requires a registration, notification, permit, or license application of a Host with a local governmental authority through Karta in accordance with local law, we may share information of participating Hosts with the relevant authority, both during the application process and, periodically thereafter, such as the Host's full name and contact details, Accommodation address, tax identification number, Listing details, and number of nights booked.

4.6 Programs with Managers and Owners.

We may share personal information of Hosts and Guests such as booking information, and information related to compliance with applicable laws such as short-term rental laws with landlords, management companies, and/or property owners (the "**Building Management**"), in order to facilitate programs with Building Management. For example, guest booking and personal information, including guest contact information, may be shared with the Building Management of the building, complex, or community where a host lives and/or the listing is located, to facilitate hosting services, compliance with applicable laws, security, billing, and other services.

4.7 Host Information Provided to Karta for Work Customers.

If a booking is designated as being for business or work purpose and (1) is made by a Guest affiliated with an Enterprise, (2) the Enterprise is enrolled in Karta for Work, we may disclose information related to the booking to the Enterprise (e.g., name of the Host, Accommodation address, booking dates, Listing details, etc.) to the extent necessary for the adequate performance of Karta's contract with the Enterprise and to provide the services. At the request of the Enterprise or the Guest, we may also share this information with third parties engaged by the Enterprise to provide support services.

4.8 Service Providers.

We share personal information with affiliated and unaffiliated service providers to help us run our business, including service providers that 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 Karta Services through third-party platforms and software tools (e.g. through the integration with our APIs), (vi) provide customer service, advertising, or payments services, (vii) process, handle or assess insurance claims or similar claims, or (viii) facilitate non-profit and charitable activities consistent with Karta's mission. These providers are contractually bound to protect your personal information and have access to your personal information to perform these tasks.

4.9 Business Transfers.

If Karta 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.

4.10 Corporate Affiliates.

To support us in providing, integrating, promoting and improving the Karta Platform, Payment Services, and our affiliates' services, we may share personal information within our corporate family of companies that are related by common ownership or control. Some examples are:

- **Sharing with Karta.** Irrespective of your country of residence, your information will be shared with Karta, which provides the technical infrastructure, customer support and other business operation services for the Karta Platform.
- **Sharing with Karta Payments.** In order to facilitate payments on or through the Karta Platform, certain information will be shared with the relevant Karta Payments entity.

5. OTHER IMPORTANT INFORMATION

5.1 Analyzing your Communications.

We may review, scan, or analyze your communications on the Karta Platform for reasons outlined in the "How We Use Information We Collect" section of this policy, including fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, analytics, enforcing our Terms of Service, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyze messages to mask contact information and references to other sites. In some cases, we may also scan, review, or analyze messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible. Occasionally we may need to manually review communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyze your messaging communications to send third-party marketing messages to you and we will not sell reviews or analyses of these communications.

5.2 Linking Third-Party Accounts.

You can link your Karta account with certain third-party services like social networks. Your contacts on these third-party services are referred to as "Friends." When you direct the data sharing by creating this link:

- some of the information provided to us from linking accounts may be published on your public profile,
- your activities on the Karta Platform may be displayed to your Friends on the Karta Platform and/or that third-party service,
- a link to your public profile on that third-party service may be included in your Karta public profile,
- other Karta users may be able to see any Friends that you may have in common with them, or that you are a Friend of their Friend if applicable,
- other Karta users may be able to see any schools, hometowns or other groups you have in common with them as listed on your linked social networking service,
- information you provide to us from the linking of your accounts may be stored, processed and transmitted for fraud prevention and risk assessment purposes, and
- publication and display of information that you provide to the Karta Platform through this linkage is subject to your settings and authorizations on the Karta Platform and the third-party service.

5.3 Third-Party Partners & Integrations.

Parts of Karta may link to third-party services, not owned or controlled by Karta, such as Google Maps/Earth or MapTiler mapping services. Use of these services is subject to the privacy policies of those providers, such as Google Maps/Earth Additional Terms of Use, Google Privacy Policy, and MapTiler AG General Terms and Conditions. Karta does not own or control these third parties and when you interact with them you are providing your information to them.

6. YOUR RIGHTS

You can exercise any of the rights described in this section consistent with applicable law.

6.1 Managing Your Information.

You can access and update some of your personal information through your Account settings. If you connected your Karta Account to a third-party service, like Facebook or Google, you can change your settings and unlink from that service in your Account settings. You are responsible for keeping your personal information up to date.

6.2 Data Access and Portability.

In some jurisdictions, applicable law may entitle you to request certain copies of your personal information or information about how we handle your personal information, request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format, and/or request that we transmit this information to another service provider (where technically feasible).

6.3 Data Erasure.

In certain jurisdictions, you can request that your personal information be deleted. Please note that if you request the erasure of your personal information:

- We may retain your personal information as necessary for our legitimate business interests, such as prevention of money laundering, fraud detection and prevention, and enhancing safety. For example, if we suspend an Karta Account for fraud or safety reasons, we may retain information from that Karta Account to prevent that Member from opening a new Karta Account in the future.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, Karta and Karta Payments may keep information for tax, legal reporting and auditing obligations.
- Information you have shared with others (e.g., Reviews, forum postings) will continue to be publicly visible on Karta, even after your Karta Account is cancelled. However, attribution of such information to you will be removed. Some copies of your information (e.g., log records) will remain in our database, but are disassociated from personal identifiers.
- Because we take measures to protect data 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.

7. SECURITY

While no organization can guarantee perfect 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.

8. CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time in accordance with applicable law. If we do so, we will post the revised Privacy Policy and update the “Last Updated” date at the top. In case of material changes, we will also provide you with notice of the modification by email at least thirty (30) days before the effective date. If you disagree with the revised Privacy Policy, you can 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 Karta Platform will be subject to the revised Privacy Policy.

9. CONTACT INFORMATION AND RESPONSIBLE KARTA ENTITIES

For questions or complaints about this Privacy Policy or Karta’s handling of personal information (i) please contact us at Leborska 3B, Gdansk, 80-386, Poland (ii) for payments related matters please use the contact information provided in the Payments Terms of Service page. (iii) Where your personal information is processed for direct marketing purposes, you may, at any time ask Karta to cease processing your data for these direct marketing purposes by sending an e-mail to hello@karta.com.