



PERSONAL DATA PROTECTION AND CONFIDENTIALITY POLICY

LAST UPDATE: 26 DEC. 2022

CONTENTS

I. INTRODUCTION	4
II. DEFINITIONS.....	4
III. CREDITS	4
IV. COLLECTION OF PERSONAL INFORMATION	4
1. Information you give us.	4
1.1 Information required to the use of Metatulia website.	4
1.2 Information we collect automatically (from your use of the Metatulia Website).....	5
1.3 Information we collect from third parties.....	5
2. Child data.....	6
V. HOW WE USE THE INFORMATION WE COLLECT	6
1. Provision, improvement and development of the Metatulia Website.....	6
2. Creating and maintaining a reliable and secure environment.	6
3. Provide, personalize, measure and improve advertising and marketing.	7
4. How we use the personal information collected.....	7
5. Your choices	8
VI. RECIPIENTS OF THE DATA	8
1. Notification between Members.....	8
2. Profiles, listings and other public information.....	8
3. Service providers.....	9
4. Compliance with the law.....	9
5. Aggregate data.....	9
VII. OTHER IMPORTANT INFORMATION	10
1. Partners and third parties	10
VIII. YOUR RIGHTS	10
1. Right to update, correct and access own data.....	10
2. Right to object to processing	10
3. Right to oblivion	10
4. Right to portability,	11
IX. PERSONAL DATA SECURITY	11

X. AMENDMENTS 11

XI. CONTACT 12

I. INTRODUCTION

1. Thank you for using Metatulia.com! Your trust is important to us and we are committed to protecting the privacy and security of your personal information in accordance with [European Regulation 2016/679](#). The information provided by you, helps us to provide a better experience at Metatulia.com.
2. This Privacy Policy describes how we collect, use, process and disclose your personal information, in conjunction with your access to and use of the Metatulia.com.
3. Your consent to the use of cookies in accordance with the terms of our policy during your first visit to the website, allows us to use cookies every time you visit our website.

II. DEFINITIONS

By “Metatulia website” we mean either metatulia.com or metatulia-villas.com.

III. CREDITS

This document was created using a template by SEQ Legal (seqlegal.com) and modified by crete-net (www.crete-net.gr)

IV. COLLECTION OF PERSONAL INFORMATION

There are three general categories of information we collect.

1. Information you give us.

1.1 Information required to the use of Metatulia website.

We request and collect the following personal information when you use the Metatulia Website. This information is necessary for the adequate performance of the contract between us and for us to be able to comply with our legal obligations. Without this, we may not be able to provide you with all the required services.

- ***Booking Request Information.*** When you request to make a reservation, we need your email address, your Name, Surname, Mobile number and the Country of your residence.
- ***Contact Metatulia with contact form.*** When you contact Metatulia using the website contact form, we collect the information of your email address, your Name, Surname and Mobile number.

1.2 Information we collect automatically (from your use of the Metatulia Website).

When you use the Metatulia Website, we automatically collect personal information about the services you use and how you use them.

- **Usage information.** In order to ensure the correct functionality of the platform and to correct eventual technical problems that may occur during your navigation, we collect information about your interactions with the Metatulia Website, such as the pages or content you view, your searches for listings, bookings and other actions on the Metatulia Website. When there are not any errors or the errors are resolved, those data collected are deleted at later, one month after their collection.
- **Log data and device information.** We automatically collect log data when you access and use the Metatulia Website. This information includes, but is not limited to: details on how to use the Metatulia Website (including if you clicked links to third-party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique IDs, bug data, cookie data, and pages that you have seen or interacted with before or after using the Metatulia Website.
- **Cookies and similar technologies.** We may collect specific information through automated means using technologies such as cookies, browser analysis tools, server logs.

A cookie is a file that contains an identifier (a series of letters and numbers) that is sent through a server and stored in the browser. The ID is then sent back to the server each time the browser requests a page from the server. Cookies can be either "permanent" or "login" cookies: a persistent cookie is stored in a browser and remains valid until its expiration date, unless deleted earlier by the user, a login cookie on the other hand will expire at the end of the user login when the browser is closed. Cookies usually do not contain information that can identify the user but your personal data we hold may be linked to data stored or retrieved by cookies.

The information we collect is used only on unrecognizable data without reference to personal data. For example, we may use the information we collect to better understand traffic patterns and optimize our site experience.

We do not currently use cookies (online or permanently) on our website to collect this information. When this happens you will be notified in a timely manner as well as this privacy policy will be modified on the Metatulia Website.

You can delete cookies if you choose. See about it here: www.aboutcookies.org. You can delete all cookies that are already on your computer, as well as configure most browsers to prevent the installation of cookies. If you choose to delete or remove certain cookies, the operation of our website may be affected.

1.3 Information we collect from third parties.

If you write a review, it will be posted on the Metatulia Website public page with your consent.

To the extent permitted by applicable law and with your consent, where required, the Metatulia Website may use your information, including your full name and the date of your booking, to obtain reports from local authorities of infringements.

2. Child data

Our website and applications are not intended for children under the age of 18 and we do not knowingly collect personal information directly from children under the age of 18. If you believe that we are improperly processing the personal information of a child, we take it very seriously and urge you to contact us using the information provided in the "Contact Us" section below.

V. HOW WE USE THE INFORMATION WE COLLECT

1. Provision, improvement and development of the Metatulia Website.

We may use your personal information to provide, improve and develop the Metatulia Website, as:

- Having access and use the Metatulia Website,
- Protect, improve and optimize the website and its user experience, such as collecting statistics and conducting surveys,
- Provide customer service,
- Send support messages, updates, security alerts, and account alerts,

We process this personal information for these purposes, given our legitimate interest in improving the Metatulia Website and our customer's experience with it, and where necessary for the proper performance of the service with you.

2. Creating and maintaining a reliable and secure environment.

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

- detecting and preventing fraud, spam, abuse, security incidents and other harmful activities;
- conducting safety investigations and risk assessments,
- verification or authentication of other information or identifications you have provided to us (such as verifying your residence address or comparing your identity photo with another photo you have provided);
- conducting checks on databases and other sources of information, including background checks or police data, to the extent permitted by applicable law and with your consent, where required;
- to comply with our legal obligations,

- for resolving any disputes with any of our Members and enforcing our agreements with third parties,
- to enforce our Terms of Service and other policies,

We process this personal information for these purposes, given our legitimate interest in protecting the Metatulia Website, in enforcing our contract with you and in complying with applicable laws.

3. Provide, personalize, measure and improve advertising and marketing.

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

- send promotional messages or other information you may be interested in based on your preferences (including information about the Metatulia Website or promotions and services campaigns and social media advertising through social media platforms), or
- to participate in lotteries, contests or other promotional activities or events sponsored or managed by Metatulia Website

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

4. How we use the personal information collected.

We may use personal information for the following reasons:

- Detect and prevent fraud, abuse, security incidents and other harmful activities.
- Carrying out safety investigations and risk assessments.
- Carrying out checks against databases and other sources of information.
- Compliance with legal obligations (such as regulations against money laundering).
- To ensure the implementation of the Terms and other payment policies.
- With your consent, we can send you advertising messages, marketing, advertising and other information that may be of interest to you based on your preferences.

We process this personal information, given our legitimate interest in improving our services and our user experience with them, and where necessary, for the proper performance of the contract with you and for compliance with applicable laws.

5. Your choices

You have options regarding the notifications we send you that are related to important information about your bookings, accommodation and activity on the Metatulia Website.

Even if you opt out of email alerts, we may send you important alerts related to activity confirmations or fraud alerts.

VI. RECIPIENTS OF THE DATA

1. Notification between Members.

In order to facilitate bookings or any other interaction between Members, we may need to share certain information, including personal information, with other members, as is necessary for the proper performance of the contract between us:

- When you, as a Guest, request a booking, certain information is shared with the Host, including your profile, full name, full guest name, cancellation history, and other information that you agree to share. Once your booking is confirmed, we will disclose additional information (to the Host) to help you plan your trip, such as your phone number.

We do not share your billing and payment details with other Members.

2. Profiles, listings and other public information.

The Metatulia Website allows you to publish information, including personal information, to the general public. For example:

- Upon completion of the booking, Guests and Hosts can write reviews and rate each other. Reviews and ratings may also appear elsewhere on the platform (such as on the listing page).

Based on our legitimate interest in promoting the Metatulia Website, we may display portions of the platform (eg your listing page) on sites managed by our business partners using technologies such as widgets or APIs.

The information you share publicly on the Metatulia Website may be indexed by third party search engines (Google). If you change your settings or the content you see in the audience, these search engines may not update their databases. We do not control the practices of third party search engines.

3. Service providers.

We use third party services to provide services related to the Platform. Service providers may be located inside or outside the European Economic Area ("EEA"). Specifically, our service providers are based in Europe and North America.

For example, service providers can help us with: (i) sending cell phone messages, (ii) verifying your identity or checking your identity documents, (iii) conducting history or police checks, fraud prevention and risk assessment, (iv) provision of advertising services. These providers have limited or no access to your personal information to perform these tasks on our behalf.

4. Compliance with the law.

Payments may disclose your information, including personal information, to courts, law enforcement, government, tax authorities or authorized third parties, to the extent required or permitted by law, if such disclosure is reasonably necessary for : (i) comply with our legal obligations, (ii) comply with a valid legal claim or respond to claims filed against the Metatulia Website, (iii) respond to a valid legal claim related to a criminal investigation or alleged or suspicious illegal activity or any other activity that may expose us, you or any of our users to legal liability, (iv) for the enforcement and management of the Terms of Service or other agreements, or (v) for the protection of rights, property or personal security of the Platform, its employees or its Members. For example, if permitted due to pending circumstances, the host's tax information may be disclosed to tax authorities or other government agencies.

These disclosures may be necessary to comply with our legal obligations and to defend our legal rights, to protect your own or another person's interests, to facilitate the collection of taxes and the prevention of tax fraud, or to prevent damage.

Hosts and Visitors, where legally permitted under applicable law, expressly authorize us, without further notice, to disclose host and visitor data and other information related to or about them, their transactions, bookings, residence taxes and completeness of registration with the competent tax authority, including, for example, the name of the Host or Guest, registration addresses, transaction dates and amounts, the amount of taxes received (or due) by the hosts from visitors and contact details.

5. Aggregate data.

We may also disclose aggregate information, which is designed not to identify an individual user, or other anonymous information, for regulatory compliance, industry and market analysis, research, demographics, marketing, advertising, and other business purposes.

VII. OTHER IMPORTANT INFORMATION

1. Partners and third parties

The Metatulia Website may contain links to third party websites or services. Metatulia Website does not own or control these companies and when you interact with them, you may provide information directly to them, Metatulia Website or both. These companies will have their own rules regarding the collection, and use of personal information. We encourage you to read the privacy policies of the other sites you visit.

Parts of the Metatulia Website platform may use third-party services, such as Google Maps and other. Use of these services is subject to their privacy policies.

The personal information you post on our site or submit for publication on our site may be available online worldwide. We cannot prevent the use or misuse of such information by third parties.

VIII. YOUR RIGHTS

1. Right to update, correct and access own data

According to the current legislation, you can ask us to give you, any information we keep from the contact page. We may ask you to verify your identity and your request before taking any further action on your request. We may withhold the personal information you request for the period permitted by law.

In practice, you will usually either explicitly agree in advance to the use of your personal information for advertising purposes, or we will give you the opportunity to exclude your information from the use for advertising purposes.

Please let us know if the information we have about you needs updating or correction.

2. Right to object to processing

You can ask us at any time not to process your personal information for advertising purposes.

3. Right to oblivion

We generally retain your personal information for as long as necessary for the performance of the contract between us and to comply with our legal obligations.

You can request the deletion of all your personal information. Please note that if you request the deletion of your personal information:

- We may retain some of your personal information as required by our legitimate business interests, such as detecting and preventing fraud and enhancing security.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, Metatulia Website may retain some of your information on tax, legal and audit obligations.
- Any reviews you have made on Metatulia Website may still be publicly visible on the Platform, even after your account has been canceled. However, the retrieval of such information to you will be terminated. Additionally, some copies of your information (eg logs) may remain in our database but are disconnected from your personal IDs.
- Because we keep and protect our data from accidental or malicious loss and destruction, some remaining copies of your personal information may not be removed from our backup systems for a limited period of time.

4. Right to portability,

You have the right to request that the data relating to you be received in a structured, commonly used and machine-readable format, and that such data to be transmitted to another processor.

IX. PERSONAL DATA SECURITY

We are constantly creating and updating technical and physical security measures to protect your information from 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.

To browse our site, we use secure connection and data security measures to prevent the risk of loss, misuse, unauthorized access and disclosure of your personal information.

All electronic money transactions on our site are protected by our encryption technology.

You acknowledge that the transmission of information over the Internet is inherently insecure and that we cannot guarantee the security of data transmitted over the Internet.

You are responsible for maintaining the confidentiality of the password you use, we will not ask for your password (unless you log in to our site).

If you know or have reason to believe that your account credentials have been lost, stolen, misappropriated or tampered with, or in the event of any actual or suspected unauthorized use of your account, please contact us as described in the Contact section..

X. AMENDMENTS

Metatulia Website reserves the right to modify this Privacy Policy at any time in accordance with this provision. You should check the page from time to time to make sure you understand any changes to our policy. If we make changes we will post the revised version on the Metatulia

Website and update the "Last Updated" date at the top of the Policy. We will also notify you of the modification via email before their effective date. If you disagree with the revised Privacy Policy, you may cancel your Account. If you do not cancel your account before the revised Privacy Policy expires, continued access to or use of the Metatulia Website is subject to the revised Privacy Policy.

XI. CONTACT

If you have any questions or concerns about this Privacy Policy or Metatulia Website information handling practices or feel that your privacy rights are being violated, please email us at: info@metatulia.com

If the issue is not resolved, you can upload it to the European Commission's electronic dispute resolution platform. You will find it here: <https://ec.europa.eu/consumers/odr/main/index.cfm?event=main.home2.show&lng=EL>