

## **LAST UPDATE: 25 MAY 2018**

The Freebird Club Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use [www.thefreebirdclub.com/website-terms-of-use-and-acceptable-use/](http://www.thefreebirdclub.com/website-terms-of-use-and-acceptable-use/) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.thefreebirdclub.com](http://www.thefreebirdclub.com) you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Acts 1988 to 2018 (the **Acts**), the data controller is The Freebird Club Limited with a registered address of 17 Alexandra Court, Dundrum, Dublin 14, Ireland.

### **INFORMATION WE MAY COLLECT ABOUT YOU**

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our site [www.freebirdclub.com](http://www.freebirdclub.com) (**our site**) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, request a cancellation, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, photo ID, financial and credit or debit card information, personal description and photograph, and description and photographs of your property.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); properties and hosts you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties

(including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

- **Information about you provided by other members.** As part of our review process members are asked to review each other as hosts and guests following a stay. If you partake in a Freebird Club stay as either a guest or host, another member will review their experience with you as either guest or host.

## COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy [LINK].

## USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- to verify your identity. Information used in this regard (namely photo ID) is for once-off identity verification purposes. It is not stored or archived for any other purposes, and will be deleted from our database within a reasonable time-frame (usually 1 month after submission).
  - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other goods and services we may offer that are similar to those that you have already purchased or enquired about;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order form **OR** registration form);
  - to notify you about changes to our service;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
    - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our site safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).
  - **Information about you provided by other members.** To help inform and guide other members in making choices about booking a stay with you or accepting you as a guest in their home. Member reviews are designed to help build trust and confidence in the community.
  - **Communications with the Freebird Club and other Club Members.** When you communicate with the Freebird Club or use the Freebird Club platform to communicate with other members, we collect information about your communication and any other information you choose to provide.

## DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in sections 7 and 8 of the Irish Companies Act 2014.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Card payments operators that process incoming payments from you to The Freebird Club
- Banks, for the purpose of transferring due amounts from The Freebird Club account to our recipient hosts
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged over 60 have clicked on their advertisement on any given day). We may also use such aggregate information to help

advertisers reach the kind of audience they want to target (for example, women in Dublin 4). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If The Freebird Club Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use [www.thefreebirdclub.com/website-terms-of-use-and-acceptable-use/](http://www.thefreebirdclub.com/website-terms-of-use-and-acceptable-use/) or terms and conditions of supply [www.thefreebirdclub.com/terms-of-supply/](http://www.thefreebirdclub.com/terms-of-supply/) and other agreements; or to protect the rights, property, or safety of The Freebird Club Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Debit and credit card details are not held or processed by The Freebird Club, these are entirely processed, maintained and stored by our third party online payment provider Stripe via Stripe's secure infrastructure for storing, encryption, and transmitting card details and payment infrastructure. For more details about Stripe's security, read <https://stripe.com/docs/security/stripe>. All other information you provide to us, including bank account details for host payments will be stored on our secure servers using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received

your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **YOUR RIGHTS**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data if it arises. You can also exercise the right at any time by contacting us at [hello@thefreebirdclub.com](mailto:hello@thefreebirdclub.com) or by post to The Freebird Club, Greenway Hub, DIT Grangegorman, Dublin 7., Ireland.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **ACCESS TO INFORMATION**

The Acts give you the right to access information held about you. Your right of access can be exercised in accordance with the Acts. Any access request may be subject to a fee of €6.35 to meet our costs in providing you with details of the information we hold about you.

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [hello@thefreebirdclub.com](mailto:hello@thefreebirdclub.com) or by post to The Freebird Club, Greenway Hub, DIT Grangegorman, Dublin 7, Ireland.