

PRIVACY POLICY

Thank you for visiting the HostelPass, Inc. (“HostelPass”) website (the “HostelPass Website”) and reviewing our Privacy Policy. While visiting the HostelPass Website, we will not collect any personal information about you unless you choose to provide that information to us. If you choose to provide any information, it will be used for the express purpose for which it was intended, such as responding to your request for information or registering for subscription services. We remind you that if you visit a link outside of the HostelPass Website, you are subject to the privacy policies of that site.

Your privacy is very important to us. We do not sell or rent your personal information to third parties for their marketing purposes. Please read this Privacy Policy to learn more about the ways in which we use and protect your personal information. If you have additional questions, you may send an email to support@hostelpass.co or call us at +1 (323) 375-4808.

Overview.

The privacy practices of this statement apply to our Services available under the domain and sub-domain of www.HostelPass.co and apply generally to any parent, subsidiaries and joint-venture sites. By visiting this HostelPass Website, you agree to be bound by the terms and conditions of this Privacy Policy and the general terms and conditions set out in the Terms of Use. If you do not agree, please do not use or access our HostelPass Website. This Privacy Policy describes the information, as part of the normal operation of our Services, which we collect from you and what may happen to that information. Any subsidiaries and joint venture partners operate under similar privacy practices as described in this Privacy Policy and, subject to the requirements of applicable law, we strive to provide a consistent set of privacy practices throughout our global HostelPass Website user community.

By accepting this Privacy Policy and our general terms and conditions during registration, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the HostelPass Website’s Terms of Use (“Terms”). This Privacy Policy is effective upon acceptance in registration for new registering users, and is otherwise effective as of November 6 2016 for all users.

Information We Collect.

Our primary purpose in collecting personal information from you is to provide you with a safe, smooth, efficient, and customized experience. This allows us to provide services and features that will meet your needs and to customize our Services to make your user experience safer and easier. We only collect personal information about you that we consider necessary or useful for achieving these purposes. In general, you can browse the HostelPass Website without telling us who you are or revealing any personal information about yourself. Once you give us any of your personal information, you are not anonymous to us. If you choose to use our HostelPass Website, we may require you to provide contact and identifying information, billing information, shipping information and other personal information as indicated on forms throughout the HostelPass Website. Where possible, we indicate which fields are required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature.

Under some circumstances, we may require some additional financial information, such as, but not limited to, credit card information. We may use your financial information, including credit card information, to verify the accuracy of your name, address, and other information, as well as to bill you for

your use of our Services. We automatically track certain information about you based upon your behavior on our HostelPass Website. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve you and our community. This information may include the URL that you just came from (whether this URL is on our HostelPass Website or not), which URL you next go to (whether this URL is on our HostelPass Website or not), your computer browser information, and or your IP address.

We currently use cookies on our HostelPass Website to check your language preference and to maintain session information, including identification of users and preparation of customized webpages. We do not save information across visits; we only use cookies to maintain session information during one unique visit.

Web browsers set aside a small amount of space on your hard drive to keep these preferences, and then every time you visit a HostelPass Website your browser checks to see if you have any predefined preferences (cookies) for that server. If you do, it sends the cookie to the server along with the request for a webpage. Your browser will not give up its cookie data to any server except the one that set it. If you establish a credit account with HostelPass to pay any fees, we may collect some additional information, such as: a billing address, credit card number and credit card expiration date and tracking information from checks or money orders.

If you send us personal correspondence, such as emails or letters, we may collect and store such information into a file specific to you.

Our Use of Your Information.

We use your personal information to facilitate the Services you request. We may use personal information in the file we maintain about you and other information we obtain from your current and past activities on the HostelPass Website to: resolve disputes; troubleshoot problems; bill your account; inform you about online and offline offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our Terms; and as otherwise described to you at the time of collection, use or disclosure. At times, we look across multiple users to identify problems or resolve disputes, and in particular, we may examine your personal information to identify users using multiple User ID's or aliases. We may compare and review your personal information for errors, omissions and for accuracy.

If you choose to open a billing account, or otherwise provide us your financial information, we use your address and financial information to bill you and provide associated support.

You agree that we may use personal information about you to improve our marketing and promotional efforts, to analyze HostelPass Website usage, to improve our content and product offerings, and to customize HostelPass Website content, layout, and services. These uses improve the HostelPass Website and better tailor it to meet your needs, so as to provide you with a smooth, efficient, safe and customized experience while using the Services. You agree that we may also use your personal information to contact you and deliver information to you that, in some cases, are targeted to your interests, administrative notices, product offerings, and communications relevant to your use of the HostelPass Website and or Services. By accepting the Privacy Policy, you expressly agree to receive this information. You may make changes to your notification preferences at any time.

Our Disclosure of Your Information.

As a matter of policy, we do not sell or rent any of your personal information to third parties for their marketing purposes.

External Service Providers.

There are a number of separate services offered by third parties that we refer to as “external service providers” that may be complementary to your use of the HostelPass Website and or Services. If you choose to use these separate services, disclose information to the external service providers, and or grant them permission to collect information about you, then their use of your information is governed by their privacy policies. Unless you opt out by sending an email to support@hostelpass.co, we may provide some of your personal information to the external service provider offering such services, for your convenience. To prevent our disclosure of your personal information to an external service provider, you can decline such consent or simply not use their products or services. Because we do not control the privacy practices of these third parties, you should evaluate their practices before deciding to use their products or services.

Internal Service Providers for Our Operations.

We may use third parties that we refer to as “internal service providers” to facilitate or outsource one or more aspects of the business, product and service operations that we provide to you (e.g. couriers, mail, and bill collection) and therefore we may provide some of your personal information directly to these internal service providers. These internal service providers are subject to confidentiality agreements with us and other legal restrictions that prohibit their use of the personal information we provide them for any other purpose except to facilitate the specific outsourced HostelPass Website related operation.

Other Corporate Entities.

We may share our data, including personal information about you, with our subsidiaries and joint ventures or potential partners or assignors. To the extent that these entities may have access to your information, they will treat it at least as protectively as they treat information they obtain from their other users. Our subsidiaries, joint ventures, potential partners or assignors shall follow privacy practices no less protective of all users than our practices described in this document, to the extent allowed by applicable law.

Control of Your Password.

You are responsible for all actions taken with your User ID and password, including fees charged to your account. Therefore, we do not recommend that you disclose your HostelPass Website password to any third parties. If you choose to share your User ID and password or your personal information with third parties, you are responsible for all actions taken with your account and therefore you should review that third party’s privacy policy before doing so. If you lose control of your password, you may lose substantial control over your personal information and may be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason, you should immediately change your password.

Accessing, Reviewing and Changing Your Personal Information.

We offer you the ability to automatically review and change the personal information you submit to us by logging into the HostelPass Website and entering the new information yourself. You can change your password, email address, contact information, financial information, and user preferences. You must promptly update your information if it changes or is inaccurate.

We can remove any of your personal information that you have revealed to us through the Services from our active databases upon request. To make this request, please contact us at support@hostelpass.co or call our Customer Care team at +1 (323) 375-4808. We will retain in our files some personal information you have requested us to remove in order to prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, enforce our Terms and comply with legal requirements as is permitted by law. Therefore, you should not expect that all of your personal information will be completely removed from our databases in response to your requests. However, such personal information will be deactivated from public and member viewing and will only be available to select HostelPass personnel.

Information Collected and Stored Automatically.

HostelPass automatically collects some technical information from you when you visit the site in order to give you the best possible experience. HostelPass uses web measurement technology (Google Analytics) to automatically track how visitors interact with the HostelPass Website including where they came from, what they did on the HostelPass Website and whether they completed any pre-determined tasks while on the site. This type of usage is classified by the Office of Management and Budget as Tier 2 usage since it is a multi-session web measurement. Aggregate data is used to help HostelPass improve our user interface and diversify our content offerings to meet the needs of our customers, track operational problems, prevent fraud and improve the effectiveness, security and integrity of the HostelPass Website. This information does not identify you personally and data is only retained in accordance with the HostelPass data retention policy. For each page that you visit, we collect and store only the following technical information:

- Date and time of access
- URL address of the HostelPass Website's webpage visited
- Internet domain and IP address from which our HostelPass Website was accessed
- Type of browser and operating system used to access our HostelPass Website (if provided by the browser)
- URL address of the referring page (if provided by the browser)
- Completion or success status of the request for a web page or other online item
- File size of the webpage visited

This information is only used to help us make the HostelPass Website more useful for you. With this data we learn about the number of visitors to our HostelPass Website and the types of technology our visitors use. We do not share this data with anyone outside HostelPass unless necessary for law enforcement purposes.

Cookies.

When you visit some websites, their web servers generate pieces of information known as cookies, which helps webmasters understand how users interact with their site's content and services. Websites use cookies to track one's activities on a website (e.g., pages visited, links clicked on, etc.), and to record information about the user so when the user returns to the site, customized features can be provided.

There are two types of cookies. A session cookie is a line of text that is stored temporarily in your web browser's memory cache, and will expire when the browser is closed. A session cookie is not placed on any hard drive, and it is destroyed as soon as you close your browser. A persistent cookie is saved to a file on your hard drive and is accessed whenever you re-visit the website that put it there. This lets that website remember what you were interested in the last time you visited.

We use persistent cookies to enable Google Analytics to differentiate between new and returning visitors to our HostelPass Website. Persistent cookies remain on your computer between visits to the HostelPass Website until they expire. We also use persistent cookies to block repeated invitations to take the customer satisfaction survey. The persistent cookies that block repeated survey invitations expire in ninety (90) days.

HostelPass may utilize third-party services to enhance its distribution of data and information (e.g., videos) through links from the HostelPass Website. A persistent cookie may be set by such a third-party provider when you click on the provider's link in order to access HostelPass data (e.g., play a video).

By default, persistent cookies and web measurement technologies are automatically used when you visit the HostelPass Website. Nevertheless, if you decide to disable or remove cookies from your browser, you will continue to have access to all information and resources on the HostelPass Website. To learn more about how to disable cookies in your browser please visit http://www.usa.gov/optout_instructions.shtml

Information Collected from Interactive Forms and Surveys.

The HostelPass Website provides interactive forms that let you voluntarily submit personal information (such as your email address, name, or organization). This occurs when you register to join a subscription service; sign up to receive e-mail updates and/or newsletters; and send questions and comments to the HostelPass team. In these cases, all submitted information is used only for the express purposes for which it is provided, and is not made available to any third party.

HostelPass only shares information you voluntarily provide with other government agencies if required by law. HostelPass never collects information or creates individual profiles for commercial marketing.

HostelPass may also use online survey instruments to obtain feedback on your experience with the HostelPass Website. The survey initiation pops up for a random sample of visitors, is voluntary and does not collect personal information. If you decline the survey, you will still have access to the same information and resources of the Website as those who do take the survey. The survey reports are available only to HostelPass managers and other staff who require this information to perform their duties. HostelPass retains the data from the survey results in accordance with its data retention policy.

Children's Privacy.

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the Internet. HostelPass does not knowingly contact or collect personal information from children under age thirteen (13). The HostelPass Website is not intended to solicit information of any kind from children under age thirteen (13).

It is possible that by fraud or deception we may receive information pertaining to children under age thirteen (13). If we are notified of this, as soon as we verify the information, we will immediately obtain parental consent or otherwise delete the information from our servers. If you want to notify us of our receipt of information by children under age thirteen (13), please do so by sending an email to support@hostelpass.co.

Legal Requests.

HostelPass cooperates with law enforcement inquires, as well as other third parties to enforce laws such as: intellectual property rights, fraud and other rights, to help protect you and the HostelPass Website community from bad actors. Therefore, in response to a verified request by law enforcement or other government officials relating to a criminal investigation or alleged illegal activity, we can (and you authorized us to) disclose your name, city, province, telephone number, email address, and or user history without a subpoena. However, in an effort to balance your right to privacy and the ability to keep the community free from bad actors, we will not disclose additional information to law enforcement or other government officials without a subpoena, court order or substantially similar legal procedure, except when the additional disclosure of information is necessary to prevent imminent physical harm or financial loss.

Other Information Collectors.

Except as otherwise expressly included in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties, whether they are other users of the HostelPass Website or other sites throughout the Internet, different rules may apply to their use or disclosure of the personal information you disclose to them. Since HostelPass does not control the privacy policies of third parties, you are subject to the privacy customs and policies of those third parties. We encourage you to ask questions before you disclose your personal information to others.

Security.

Your information is stored and processed on our servers. HostelPass uses procedural and technical safeguards to protect your personal information against loss or theft, as well as against unauthorized access or disclosure, to protect your privacy, including firewalls and encryption. We employ many different security techniques to protect such data from unauthorized access by users inside and outside the corporation; however, “perfect security” does not exist on the Internet.

Notice.

We may amend this Privacy Policy at any time by posting the amended terms on the HostelPass Website. All amended terms shall automatically be effective thirty (30) days after they are initially posted on the HostelPass Website.

This Privacy Policy was updated on November 6, 2016.