

# OpenWorld Accelerator Privacy Statement

Last Modified: January, 12, 2023

Please read the following statement (“**Privacy Statement**”) to learn about our privacy practices. This Privacy Statement explains how we collect, use, and disclose data when you visit this website. <http://www.expediagroup.com/open-world-accelerator>.

## Privacy Statement Summary

This is a summary of our Privacy Statement. To review our Privacy Statement in full please scroll down.

### What does this [Privacy Statement](#) cover?

This Privacy Statement is designed to describe:

- How and what type of personal information we collect and use
- When and with whom we share your personal information
- What choices you can make about how we collect, use, and share your personal information

### What [personal information do we collect](#) and use, and how do we collect it?

We collect personal information when:

- You give us the information
- We collect it automatically
- We receive it from others

When you create an account on one of our sites, sign up to receive offers or information, or otherwise use our platform, you give us your personal information. We also collect such information through automated technology such as cookies placed on your browser, with your consent where applicable, when you visit our sites. We also receive information from business partners and other third-parties, which help us improve our platform and associated tools and services, update and maintain accurate records, potentially detect and investigate fraud, and more effectively market our services.

### **[How is your personal information shared?](#)**

Your personal information may be shared with third parties for several purposes, including: to help provide you information, services, assist with your use of our services, communicate with you (including when we send information on products and services or enable you to communicate with others), and comply with the law, where applicable, depending on your interaction with the site. The full Privacy Statement below details how personal information is shared.

### **What are your [rights and choices](#)?**

You can exercise your data protection rights in various ways. For example, you can opt out of marketing by clicking the “unsubscribe” link in the emails, in your account as applicable, or contacting our customer service. Our full Privacy Statement has more information about the options and data protection rights available to you.

### **How to [contact us](#)**

More information about our privacy practices is in our full Privacy Statement below. Please [contact us](#) as to ask questions about how we handle your personal information or make requests about your personal information.

# Privacy Statement

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## CATEGORIES OF PERSONAL INFORMATION WE COLLECT

We receive and store any information you provide to us through the Site or given to us in any other way. This includes information that can identify you, such as your first and last name, telephone number and postal and email addresses (“**personal information**”). We may collect the following categories of personal information:

- Name, email address, telephone number, business, and billing addressees
- Non-specific geolocation data
- Images, videos, and other recordings
- Social media account ID and other publicly available information
- Communications with us

- Searches you conduct, transactions, and other interactions with you on our online services
- Data you give us about other people associated with you or your company
- We also may periodically obtain both personal and non-personal information about you from affiliated entities, business partners and other independent third-party sources.

*Sensitive Personal Information.* We only collect sensitive personal information either with consent or in accordance with local law. This may include information which could reveal your racial or ethnic origin, religious or philosophical beliefs, sexual orientation, trade union or other professional membership, and health or disability information.

*Automatically Collected Information.* We automatically collect some information about your computer and your online activity when you visit the Site. For example, we may collect your IP address and information about what web browser software you use to access the Site (such as Google Chrome, Firefox, Safari or Internet Explorer) and referring website. Where permitted by local law, we may also automatically collect information you enter into any data fields shown on the Site, including your email address and log-in credentials. We may also collect information about your online activity, such as trips viewed or bookings made. Our goals in collecting this automatic information include helping to customize your user experience and inhibiting fraud. For more information, please see the [Cookie Statement](#).

## **USE OF PERSONAL INFORMATION**

We use information about you for the following general purposes:

- Provide you with the products and services you request;
- Communicate with you in general;
- Respond to your questions and comments;
- Measure interest in and improve our products, services and the Site;
- Customize your experience with this Site;

- Solicit information from you, including through surveys; to resolve disputes, or troubleshoot problems;
- Prevent, investigate or take action on potentially prohibited or illegal activities;
- Enforce the Site's Terms of Use;
- Activities related to our business; and
- As otherwise described to you at the point of collection.

*Email Communications.* We want to make it easy for you to take advantage of opportunities on our Site. One way we do this is by sending you email messages that contain information about your apparent interests. We believe these email messages will provide you with useful information about opportunities available to Expedia partners through our Site. Please note that you will have the opportunity to choose not to receive these email messages in any such email we send.

*Clickstream data.* In certain instances, we may use clickstream data to render an illustration of your usage of our site. Clickstream data is the collection of a sequence of events that represent visitor actions on a website. We may reconstruct your site journey modeled on the timing and location of your actions. This data is primarily used for customer service purposes, to verify the legitimacy of a claim, or to defend ourselves. This data may also be used for other internal purposes such as improving the user experience on our website and identifying website malfunctions.

*Sensitive Personal Information.* We will only use your sensitive personal information for the purposes for which it was collected.

*Lawful bases for processing:*

We will collect personal information from you only (i) where the personal information is necessary to perform a contract with you (e.g., manage your booking, process payments, or create an account at your request), (ii) where the processing is in our legitimate interests and not overridden by your rights (as explained below), or (iii) where

we have your consent to do so (e.g., sending you marketing communications where consent is required). In some cases, we will have a legal obligation to collect personal information from you such as where it is necessary to use your transaction history to complete our financial and tax obligations under the law.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Certain countries and regions allow us to process personal information on the basis of legitimate interests. If we collect and use your personal information in reliance on our legitimate interests (or the legitimate interests of any third-party), this interest will typically be to operate or improve our platform and communicate with you as necessary to provide our services to you, for security verification purposes when you contact us, to respond to your queries, undertaking marketing, or for the purposes of potentially detecting or preventing illegal activities.

We may use artificial intelligence, machine learning, and other automated decision-making to enhance your user experience and keep our site safe.

For example, we may use it in relation to:

- the sort order you see on our site,
- destinations, property or activity recommendations,
- flight price insights and alerts,
- the content you upload on our site (e.g., images of your properties) to ensure they meet our quality or formatting requirements, and to identify relevant amenities included in your listing,
- the reviews you share with us to ensure they do not contain identifiable personal information or to assess customer satisfaction,

- the prevention and detection of breach of our terms and conditions or other fraudulent activities to keep our site safe,
- our language and dialects within our virtual agents' experience.

Automated decisions may be made by putting your personal information into a system and the decision is calculated using automatic processes.

We will not engage in automated decision-making that involves a decision with legal or similarly significant effects solely based on automated processing of personal information, unless you: (1) explicitly consented to the processing, (2) the processing is necessary for entering into a contract, or (3) when otherwise authorized by applicable law.

You may have rights in relation to automated decision making, including the ability to request a manual decision-making process instead or contest a decision based solely on automated processing. If you want to know more about your data protection rights, please see the Your Rights and Choices section below.

## **INTERNATIONAL DATA TRANSFER**

The personal information that we process may be accessed from, processed or transferred to countries other than the country in which you reside. Those countries may have data protection laws that are different from the laws of your country.

The servers for our platform are located in the United States, and the Expedia Group companies and third-party service providers operate in many countries around the world. When we collect your personal information, we may process it in any of those countries. Our employees may access your personal information from various countries around the world. The transferees of your personal data may also be located in countries other than the country in which you reside.

We have taken appropriate steps and put safeguards in place to help ensure that any access, processing and/or transfer of your personal information remains protected in

accordance with this Privacy Statement and in compliance with applicable data protection law. Such measures provide your personal information with a standard of protection that is at least comparable to that under the equivalent local law in your country, no matter where your data is accessed from, processed and/or transferred to.

Such measures include the following:

- Adequacy decisions of the European Commission confirming an adequate level of data protection in respective non-EEA countries.
- Ensuring that the third-party partners, vendors and service providers to whom data transfers are made have appropriate mechanisms in place to protect your personal information. For instance, our agreements signed with our third-party partners, vendors and service providers incorporate strict data transfer terms (including, where applicable, the European Commission's Standard Contractual Clauses issued by the European Commission and/or United Kingdom, for transfers from the EEA/UK), and require all contracting parties to protect the personal information they process in accordance with applicable data protection law. Our agreements with our third-party partners, vendors and service providers may also include, where applicable, their certification under the EU-U.S. and/or Swiss-U.S. Privacy Shield certification, or reliance on the service provider's Binding Corporate Rules, as defined by the European Commission.
- Intra-group agreements in place for our group companies which incorporate strict data transfer terms (including, where applicable, Standard Contractual Clauses issued by the European Commission and/or United Kingdom, for transfers from the EEA/UK) and require all group companies to protect the personal information they process in accordance with applicable data protection law.
- Carrying out periodic risk assessments and implement various technological and organization measures to ensure compliance with relevant laws on data transfer.

## **PRIVACY SHIELD**

Certain Expedia Group U.S. affiliates have certified to the EU-U.S. and Swiss-U.S. Privacy Shield frameworks and that we adhere to the Privacy Shield Principles of



Notice, Choice, accountability for Onward Transfers, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability for personal information from the EU, Switzerland, and the United Kingdom. Such Expedia Group U.S. affiliates will continue to adhere to the Privacy Shield frameworks and Principles even though the CJEU determined in July 2020 that the EU-U.S. Privacy Shield framework is no longer an adequate transfer mechanism for the transfer of EU personal information to the U.S. In addition, Expedia Group maintains intra-group Standard Contractual Clauses where applicable to cover the transfer of EU personal information to the U.S. Our certifications can be found [here](#). For more information about the Privacy Shield principles, please visit: [www.privacyshield.gov](http://www.privacyshield.gov). For more on our adherence to the Privacy Shield Frameworks, please see information posted [here](#).

## **SECURITY**

We want you to feel confident about using the Site and we are committed to protecting the information we collect. While no website can guarantee security, we have implemented appropriate administrative, technical and physical security procedures to help protect the personal information you provide to us.

Our cybersecurity team develops and deploys technical security controls and measures to ensure responsible data collection, storage, and sharing that is proportionate to the data's level of confidentiality or sensitivity. We take efforts to continuously implement and update security measures to protect your information from unauthorized access, loss, destruction, or alteration. We hold our data-handling partners to equally high standards.

## ***EXTERNAL LINKS***

This Privacy Statement does not apply to third-party websites that may be accessed via links included on this Site. Privacy statements posted on third-party websites will outline procedures for collecting, using and disclosing personal information on those websites.

## **RECORD RETENTION**

We will retain your personal information in accordance with all applicable laws, for as long as it may be relevant to fulfill the purposes set forth in this Privacy Statement, unless a longer retention period is required or permitted by law.

When we delete your personal information, we use industry standard methods to ensure that any recovery or retrieval of your information is impossible. We may keep residual copies of your personal information in backup systems to protect our systems from malicious loss. This data is inaccessible unless restored, and all unnecessary information will be deleted upon restoration.

The criteria we use to determine our retention periods include:

- The duration of our relationship with you, or recent bookings or other transactions you have made on our platform
- Whether we have a legal obligation related to your personal information, such as laws requiring us to keep records of your transactions with us
- Whether there are any current and relevant legal obligations affecting how long we will keep your personal information, including contractual obligations, litigation holds, statutes of limitations, and regulatory investigations
- Whether your information is needed for secure backups of our systems

## **UPDATES TO PRIVACY STATEMENT**

We may update this Statement in response to changing laws or technical or business developments. If we propose to make any material changes, we will notify you by means of a notice on this page. You can see when this Privacy Statement was last updated by checking the “last updated” date displayed at the top of this Statement.

## **CONTACT US**

All notices should be sent to: [OpenWorldAccelerator@expediagroup.com](mailto:OpenWorldAccelerator@expediagroup.com)

Questions? contact us at: [OpenWorldAccelerator@expediagroup.com](mailto:OpenWorldAccelerator@expediagroup.com)