

# Landng <sup>SM</sup> Privacy Policy

**Last Updated: March 21, 2023**

**We recognize that your privacy is very important.** This privacy policy covers the policies of Landng Inc. (“Landng”) on the collection, use, and disclosure of your information, including any personally identifiable information or other data collected that could directly or indirectly identify you (“Personal Data”) when you access the Landng <sup>SM</sup> platform at [www.landng.travel](http://www.landng.travel) (the “Site”), the Landng app (the “App”), or anytime you use our other Landng products or services (the Site, the App and other Landng products and services, altogether, the “Services”).

Each time you use our Services, you consent to the collection, use and storage of the collected information as described in this Privacy Policy. Please read it carefully and contact us at [contact@landng.travel](mailto:contact@landng.travel) if you have any questions.

## 1. What information do we collect?

**Account Registration Information.** If you wish to register for an account, we will ask you to provide the following information:

- Username
- Email address
- password

**Profile Information.** Upon registering your account, you will be able to create a profile of which we may ask you to provide the following information:

- Profile photo
- Full name or Business name
- Bio or Business description
- Website

**Intake Information.** If you have an account with Landng, depending on the type of user you are, to better serve your interests, we will ask you to provide the following information by selecting the tags available from time to time:

Travel Planner	Content Creator	Business User
<ul style="list-style-type: none"><li>• Your travel interests (e.g. eco, luxury, outdoor)</li></ul>	<ul style="list-style-type: none"><li>• type of Content Creator you are (e.g., blogger, photographer, influencer)</li></ul>	<ul style="list-style-type: none"><li>• type of Business User you are (e.g., tourism authorities, cultural organizations)</li><li>• type of content you make (e.g., eco, cultural, wellness)</li></ul>

	<ul style="list-style-type: none"> <li>• type of content you make (e.g., eco, cultural, wellness)</li> <li>• type of Business User you wish to connect with</li> <li>• your travel interests (e.g. eco, luxury, outdoor)</li> </ul>	<ul style="list-style-type: none"> <li>• type of Content Creator you wish to connect with</li> <li>• your travel interests (e.g. eco, luxury, outdoor)</li> </ul>
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By providing us with the above information via tags selected, your tags will either be published on your profile or be searchable on our platform by the users so they can discover you. As the intake information does not identify you, it will not be treated as Personal Data under this Privacy Policy.

**Create Itinerary.** If you have an account, you will be able to create itineraries that will allow you to input or upload information including photos, title, description, location(s) (city/country only), accommodation(s) and duration of the trip. You can choose to make this itinerary public, share with collaborators only, or completely private using the features available in your account settings.

**Create Activity.** If you have an account, you will be able to create activities that will allow you to input or upload information including photos, title, description, location(s) (city/country only)]. You can choose to make this activity public, share with collaborators only, or completely private, using the features available in your account settings.

**Registration Through Third Party Account.** If you register or log into your account through a third-party account, such as Google, we will have access to some of your third-party account information from that service, such as your name and email address, and other information in that account as provided by that service. You should review such third-party account’s privacy policy for more information about their data collection and sharing practices. You have the ability to disable the connection between our Services and your third-party account at any time.

**Automatically Collected Online Usage Activity**

As is true of most websites, we gather certain information automatically when you visit our website. When you use our Services, we may collect certain information automatically from you, which may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about who and when you use our website and other technical information. To collect this information, a cookie may be set on your computer or device when you visit our Services. Please see section below “How We Use Cookies” for more discussion on this topic.

**Search Data and Geolocation by Google.** If you perform a Google search within the App and add locations from your Google search to your itinerary, Google will collect your IP address, certain browsing and search information from you. If you utilize the App to navigate while on a trip,

Google, through Google Maps, will collect geolocation data, which includes latitude/longitude coordinates, sensor data and other information obtained you're your smartphones, tablets, or other devices that monitor your current geographic locations. For information on the type of information Google Maps collects and how it uses the information, please review Google's Privacy Policy [here](#)

**Mobile Device Data.** When you access our Services through a mobile device, we also collect certain mobile device information automatically, including, but not limited to, the type of mobile device you use, your mobile operating system, and the type of mobile Internet browsers you use.

**Activity Updates.** We collect your email address if you sign up to receive emails, invites and newsletters from us regarding our activities.

**Services and Customer Support.** We collect information such as your name and email address to the extent necessary for us to provide the Services that you have requested and/or to provide customer support.

## 2. How we use cookies?

Cookies are small text files which are transferred to your computer or mobile device when you visit a website or app. We use them to remember your preferences, improve your user experience, and help us understand how people are using our Services, so we can make them better. Cookies can be session cookies, which expire once you close your web browser. Cookies can also be persistent cookies, which stay on your device or a set period of time or until you delete them. LANDNG uses the following types of cookies:

- **Strictly Necessary Cookies:** These cookies are necessary to allow us to operate our Services as you have requested.
- **Performance/Analytics Cookies:** We use cookies and other similar technologies to analyze how our Services are accessed, is used, or is performing. We use this information to maintain, operate, and continually improve our Services. We may also obtain information from our email newsletters or other communications we send to you, including whether you opened or forwarded a newsletter or clicked on any of its content. This information tells us about our newsletters' effectiveness and helps us ensure that we're delivering information that you find interesting.
- **Functional Cookies:** These cookies help us remember your preferences and settings to enhance your user experience.

Using our Services without cookies is also possible. In your browser, you can deactivate the saving of cookies, limit them to particular websites, or set the browser to notify you when a cookie is sent. You can also delete cookies from your PC hard drive at any time (file: "cookies"). Please note that in this case you will have to expect a limited page presentation and limited user guidance. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <http://www.allaboutcookies.org/>

### 3. How do we use the collected information?

We use the information we collect for the purposes described in this Privacy Policy, as covered in any agreement that incorporates this Privacy Policy, or as disclosed to you in connection with our Services. For example, we will use your information to:

- Provide and deliver products or services;
- Understand you and your preferences to enhance your experience, for example, recommend trips to you based on the tags you picked, allow your itineraries to be searchable by other members (with your permission) based on the tags you picked, or allowing other users to discover your profile based on the tags you picked;
- Operate and improve our operations, systems, products, and services;
- Respond to your comments and questions and provide customer service;
- Provide administrative service and support, such as sending confirmations, technical notices, updates, security alerts, and other administrative messages and providing customer support and troubleshooting;
- Communicate with you about promotions, upcoming events, and news about products and services offered by Landng and our selected partners;
- Enforce our terms and conditions or protect our business, partners, or users; or
- Protect against, investigate, and deter fraudulent, unauthorized, or illegal activity

**Electronic Communication.** Consistent with the above purposes and as permitted by applicable law, we may communicate with you via electronic messages, including email or text message to provide you with the Services. Message and data rates may apply for any text messages sent to you from us and to us from you, and we are not liable for the cost of any such messages.

**Legal Basis For Processing.** When we process your Personal Data we will only do so where at least one of the following applies:

- *Provide our service to you:* Most of the time, the reason we process your Personal Data is to perform the contract that you have with us. For example, if you create an account, we process your account registration data to provide customized and personalized Services to you. If you create an itinerary, we process your itinerary data to generate the itinerary for you and , if you choose to make your itinerary public, we make the itinerary viewable and discoverable by other users interested in your itinerary.
- *Legitimate interests:* We may use your Personal Data where we have legitimate interests to do so. For instance, we may use Personal Data to generate aggregate data to provide us with insights as to our progress in terms of achieving our mission. We will also process Personal Data for administrative, fraud detection and other legal purposes.
- *Consent:* From time to time, we may ask for your consent to use your Personal Data for certain specific reasons. You may withdraw your consent at any time by utilizing the opt-out features available in your account settings, or by contacting us at the address provided at the end of this Privacy Policy.
- *Legal Compliance:* When it is necessary for us to use your Personal Data to comply with a legal obligations.

### 4. Is Information Collected by or Disclosed to Third Parties by using the Services?

We do not share, sell or rent to third parties your information except as described in this Privacy Policy. Examples of instances in which we share your information are provided below:

- a. **Third party service providers.** We, like many businesses, sometimes engage other companies to perform certain business-related functions on our behalf so that we can focus on our core business. Examples of these services include, but are not limited to, website evaluation and data analysis, data visualization, AI marketing automation and distribution, data cleansing, and marketing and promotional material distribution.

*Google Maps.* As part of our Services, we offer users the ability to “activate” an itinerary to view itinerary locations on a map. While on a trip, users can also use the App for navigation. Users can also perform searches in Google Maps and add locations into their itineraries. For these Services we use Google Maps. For information on the type of information Google Maps collects and how it uses the information, please review Google’s Privacy Policy [here](#).

- b. **Business transfers.** We may sell, assign, buy, transfer or otherwise acquire or dispose of certain of our businesses or corporate assets. In the event of such or similar event, Personal Data we collected from you may be part of the transferred assets. We may also share Personal Data with our auditors, attorneys or other advisors in connection with the forgoing corporate transactions. You acknowledge and agree that any successor to or acquirer of us will continue to have the right to use your Personal Data and other information in accordance with the terms of this Privacy Policy.
- c. **Links to Third Party Platforms.** We may provide you with the option to connect with third party services, including websites, applications and services through “plug-ins,” widgets, buttons and other third party features on and connect with our websites, communications or products. To do so, we may share your account registration data with such third party platforms to enable them to authenticate your account. Third party platforms which we link to, may have information practices that are different from ours. This Privacy Policy does not apply to the activities of the third parties when they are collecting or using data for their own purpose or on behalf of others. We are not responsible for the activities of these third parties. We encourage you to review their privacy policies to understand how they use your information.
- d. **Aggregate Data.** Aggregate data does not identify you personally. We share aggregate data with Content Creators and Business Users about the reach of their content, which may include the total number of itineraries saved, itineraries viewed, itineraries activated and number of collaborations. Aggregate data will not be treated as Personal Data under this Privacy Policy.

- e. **Website Analytics.** We use third-party web analytics services—like Google Analytics—in our online services. These service providers help us analyze how users navigate our online services. Information collected as a part of Google Analytics is automatically sent to Google, and Google may use cookies to help with the analysis. Google Analytics may provide demographic, interest-related, geographical and referral information that LANDNG may use to better understand our customer base. Session User ID tracking and stitching may also be used to further understand how our users access our websites from different devices. To learn more about Google Analytics or download an opt-out browser add-on, please [click here](#).
  
- f. **Legal requirements.** We may disclose your Personal Data if required to do so by law (including, without limitation responding to a subpoena or request from law enforcement, court or government agency or other public authorities) or in the good faith belief that such action is necessary (i) to comply with a legal obligation, (ii) to protect or defend our rights, interests or property or that of other customers or users, (iii) to act in urgent circumstances to protect the personal safety of users of the Services or the public, or (iv) to protect against legal liability or potential fraud, as determined in our sole discretion.
  
- g. **Your consent.** If we intend to use any of your Personal Data collected in any manner that is not specified herein, we will inform you of such anticipated use prior to or at the time at which such Personal Data is collected or we will obtain your consent subsequent to such collection but prior to such use. In short, we will honor the choices you make regarding your Personal Data and will inform you about any other intended uses of such information.

## 5. Linking to or from Third Party Social Media Platforms.

Users may follow LANDNG on Facebook, Instagram, Twitter and other social media platforms as made available from time to time. Users should click on the hyperlinks for each site to review the applicable privacy policies for more detail about information collected from these sites.

## 6. How Does LANDNG Comply with the Children’s Online Privacy Protection Act?

Our Services are directed toward a general audience and are not directed at nor intended for use by children. We do not knowingly collect information from children under the age of 13 without parental consent. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at [contact@landng.travel](mailto:contact@landng.travel). We will delete such information from our files within a reasonable time.

## 7. GDPR+ Data Protection Rights.

If you are located in countries that are within the European Economic Area (the “EEA”), Switzerland or UK, GDPR and its Swiss and UK GDPR counterparts give you rights with respect to your personal data, subject to any exemptions provided by the law, including the following rights:

- Request access to your Personal Data;
- Request correction or deletion of your Personal Data;
- Object to our use and processing of your Personal Data;
- Request that we limit our use and processing of your Personal Data; and
- Request portability of your Personal Data.

Provided that you are enrolled, you can access, correct, or delete your personal data by contacting us at [contact@landng.travel](mailto:contact@landng.travel) . We will consider all such requests and provide our responses as soon as we can. Please note, however, that personal information may be exempt from such requests in certain circumstances, which may include circumstances where we need to keep processing your personal information for our legitimate interests or to comply with a legal obligations. Users located in EEA, United Kingdom or Switzerland also have the right to make a complaint to a government supervisory authority.

## **8. Cross-Border Data Transfers**

Sharing of information laid out in Section 4 sometimes involves cross-border data transfers, for instance to the United States of America and other jurisdictions. LANDNG may also subcontract processing to, or share your Personal Data with, third parties located in countries other than your home country. Your Personal Data, therefore, may be subject to privacy laws that are different from those in your country of residence.

Our Services are hosted on Amazon Web services (“AWS”). Like LANDNG, helping to protect the confidentiality, integrity, and availability of customer data is of the utmost importance to AWS, as is maintaining customer trust and confidence. For more details of AWS’ privacy and security processes and its efforts to comply with international privacy laws and regulations (including [GDPR](https://aws.amazon.com/compliance/data-privacy/)), please visit <https://aws.amazon.com/compliance/data-privacy/>. By using our Services, you consent to your personal information being transferred to our servers as set out in this policy.

Where our Services allow for users located in the European Economic Area (“EEA”), UK or Switzerland, and when we transfer their Personal Data to countries outside of the EEA, UK or Switzerland as processors, we transfer the Personal Data in accordance with applicable privacy laws and, in particular, those appropriate contractual, technical, and organizational measures as described in the [Standard Contractual Clauses](#) approved by the EU Commission, as amended from time to time. Standard Contractual Clauses are commitments between companies transferring personal data, binding them to protect the privacy and security of your data.

## **9. California Privacy Rights**

*Shine the Light Law.* Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the

preceding calendar year, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. **We do not share your personal information with third parties for direct marketing purposes.**

*California Privacy Rights Act.* As of the last date when this Privacy Policy was updated, we are not subject to California Privacy Rights Act (the “CPRA”). Regardless, **we do not sell personal information.** We will closely monitor the development of the CPRA and other privacy laws that may apply to our activities and will implement reasonable administrative, technical and physical security measures for compliance.

#### **10. How long does LANDNG retain information collected?**

We follow generally accepted standards to store and protect the Personal Data we collect, both during transmission and once received and stored, including utilization of encryption where appropriate. We retain Personal Data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods (i) mandated by law, contract or similar obligations applicable to our business operations; (ii) for preserving, resolving, defending or enforcing our legal/contractual rights; or (iii) needed to maintain adequate and accurate business and financial records. If you have any questions about the security or retention of your Personal Data, you can contact us at [contact@landng.travel](mailto:contact@landng.travel).

#### **11. What is LANDNG’s Security Policy?**

We have implemented reasonable administrative, technical and physical security measures to protect your personal information against unauthorized access, destruction or alteration. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Services. However, although we endeavor to provide reasonable security for information we process and maintain, no security system can ever be 100% secure.

#### **12. How Does LANDNG Respond to “Do Not Track” Signals?**

“Do Not Track” is a feature enabled on some browsers that sends a signal to request that a web application disable its tracking or cross-site user tracking. At present, LANDNG does not respond to or alter its practices when a Do Not Track signal is received.

#### **13. How Will I Be Notified of Changes to Your Privacy Policy?**

If LANDNG makes material changes to its Privacy Policy, it will notify you by: (i) changing the Last Updated Date at the top of the Privacy Policy, (ii) sending an email to its users, and/or (iii) adding a statement to the Site.

#### **14. Contact Us**

If you have any questions regarding privacy while using our Services, or have questions about our practices, please contact us via email at [contact@landng.travel](mailto:contact@landng.travel).