

Globe Runner's Privacy Policy

We highly respect your business and appreciate your trust. We understand the importance of confidentiality. Therefore, we have developed this Statement to explain our rules regarding personal data received in an oral or written form or provided when visiting this website, our property or from other sources.

By using any of our products or services and/or by agreeing to this Statement you understand and give your consent to collection and use of your personal data in accordance with the information set forth in this Statement. Please note that this Statement does not apply to processing of personal data on behalf of, or on the instruction of third-party companies and service providers.

Globe Runner controls all information about the guests using Servio HMS program.

1. Personal data collected by Globe Runner

Globe Runner collects personal data when communicating with guests and other contact persons, in the course of doing business, as well as using Servio HMS program. Such personal data may include your name/surname, postal address, billing address, e-mail, phone number, booking, accommodation or stay data; information about participation in contests, lotteries or marketing programs (even if you did not stay at Globe Runner); information about purchased products or services; personal data: nationality, income, passport number, place and date of issue; travel data; information about payments, such as number and other details of your payment card, as well as authentication information and other login account data related to your mobile accounts; information about your accommodation preferences; marketing information you want to receive; information about vehicles you can use or bring to our property; reviews and opinions about our brand (if they are identified or associated with you); service packages you order, including accommodation booking; groups you are related to while staying at our travelers' hub; information regarding participation in loyalty program; other information provided by you or received by us about you.

Globe Runner can request information about tourist groups, including names and phone numbers of program participants. We can also collect information related to conversations, including registration or monitoring of customer service calls for the purpose of quality control and training, and other types of communications, such as in-app messages or SMS messages.

In addition, Globe Runner may require additional personal data in the following cases:

- Surveys. When conducting surveys, Globe Runner may need demographic or other personal data.
- Collection of information in the travelers' hub. Sometimes, according to the requirements of local laws Globe Runner may demand additional personal data when you check into the travelers' hub. In Globe Runner, we can use a video surveillance system and other security devices to capture and record images of guests and visitors in places of public use, as well as information related to your whereabouts in our property (using key cards and other devices). We can also use a video surveillance system and other technologies recording sound or video to protect our employees, guests and visitors of our travelers' hub in legally prescribed cases. In addition, we may need additional information to provide a range of services at Globe Runner: organization of events, guided tours, excursions.
- Event profiles. When planning an event, Globe Runner shall register information about the event or meeting, date, number of guests, description of rooms. When holding corporate events, we will need information about organization: name, annual budget, number of activities financed during the year. We also collect information about guests who are members of your group or take part in the event. If you are visiting us as part of the group, we may have in our disposal your personal data provided by the group and may contact you after your visit as part of the group or participation in the event at your discretion in legally prescribed cases. If you visit us within the framework of the event, in legally prescribed cases, we may provide your personal data to event organizers. If you are

organizing an event, we may also share information about your event with third-party service providers who may offer services for the event in legally prescribed cases.

- **Social media.** If you want to participate in the events and promotions held by Globe Runner in social media, we may need some information from your login account in social media: whereabouts, accommodation bookings, participation in the events, interests, photos, status changes and friends list. Globe Runner can also allow you to take part in the contests with photos, for example, made during your stay at our travelers' hub, which you can post in social media for voting, showing or participating in other promotions.

In addition to information received by Globe Runner directly from you, we may also collect information based on data provided by you or received from other sources.

2. Personal data received from third-party companies

Globe Runner may also receive personal information from the third parties, including tour operators and travel agents, payment card servicing companies and other partners, social media in accordance with your settings related to such services, as well as from other third-party sources that may provide us with information about you in accordance with the law. Globe Runner can use and provide this information (and also integrate it with other data available to us) for the purposes stated in this Statement.

3. Using your personal data

Globe Runner uses your personal data in a variety of ways – for the provision and personalization of services you request to let us offer you the best hospitality experience in our property, to manage loyalty programs, to implement measures of direct marketing and sales according to the below description. Before processing your data, we obtain your consent, if required by the applicable law.

Globe Runner shall collect certain data, including your name/surname, address, payment information, and in some countries – information about travel documents to process your booking. In case you refuse to provide necessary information, we will not be able to arrange your booking.

- **Administrative management of services.** Globe Runner uses your personal information to administer the programs you take part in, when providing you with access to information about your login account, such as a bonus balance and offers you are entitled to; to perform services that are part of such a program; and to simplify the data collection process.

- **Organization of business meetings and events.** Globe Runner can use personal data to provide you with information about scheduled meetings and events.

- **Marketing and communication.** In the allowed cases, Globe Runner may use your personal data to provide or offer you a subscription for mailing lists, promotions and special offers, as well as other marketing communications in accordance with communication channels you prefer. We use your data to send messages during your stay, confirm bookings, forward marketing messages, and conduct surveys, lotteries, prize drawings and other contests. We can send these messages to e-mails, by regular mail, via Internet, via social media, by phone, in the form of text messages (including SMS and MMS), push messages, in-apps messages, as well as using other means (including sending messages in Globe Runner, for example, using a TV system in your room). With your consent, we also use your content (for example, photos) from social media to send media advertising, as well as on our website and in the apps. We may also collect information about your payment card that may be added to your personal data and used by us or our business partners to determine the type of your card. We may also cooperate with third-party companies to determine whether a visitor of our website has taken advantage of the offer to get refund for their payment card, and to provide visitors with advertising information explaining how to use this offer when staying at Globe Runner.

- Improvement of service quality. Globe Runner can use your personal data in order to improve quality of services so that our website, products and services will be of interest to you. We also use your personal data in order to provide you with an expected level of service in a room and in the entire property.

- Data accuracy, analytics and personalization. Globe Runner can integrate your personal data with data from third-party sources for the purpose of systematization and data analysis. We also use information from third-party sources to provide a higher level of service with an individual approach to each guest. For example, if you have connected social media services or other login accounts to our services, we may use this information in order to provide you with a warmer reception and an individual approach, or to provide it to third-party companies and use it in accordance with any clause of this Statement.

4. Personal data provided by Globe Runner to third-party companies

In order to offer you the highest level of service in compliance with your expectations, Globe Runner can provide your personal data to our service providers, third-party companies and other third parties in accordance with the below explanation:

- Group events or meetings. If you are staying in Globe Runner within the framework of a group event or meeting, information received for planning the meeting or event may be provided to organizers of such meetings and events and, if necessary, to guests who arrange this event or participate therein.

- Business partners. Globe Runner may cooperate with other companies in order to provide you with products, services and offers based on your stay in our property, and may transfer your information to our business partners, respectively. For example, we can agree with partners to provide you with other additional services. We may also transfer your personal data, such as an e-mail address, to our travel partners to help them evaluate the rules of travel or use of special tariff plans, or provide an opportunity for participation in marketing events jointly with our tourist partners. Globe Runner can also cooperate with third-party organizations, such as our partner tour operators, travel agents and payment card providers to ensure delivery of advertising to our joint customers. Our partners may be able to provide you with relevant offers based on information about your stay in our travelers' hub. Additionally, we may allow third-party partners to recognize you when you visit a website or use application of our partner, or to identify you as one of their clients when visiting websites so that they can provide you with relevant offers. We may transfer your hashed e-mail address to third-party companies using existing security measures so that they can link it to their hashed e-mail addresses and send you advertising materials on our behalf via the Internet and by e-mail.

- Partners arranging promotional events. Globe Runner may, in cooperation with other companies, hold promotional events, draws, lotteries, competitions or contests, as well as give prizes for lotteries and competitions held by other companies. If you participate in one of draws or contests, we can provide your data to our partners arranging the event or to third-party sponsors.

- Hotel services. Globe Runner may provide personal data to third party providers rendering services in the territory of our property, including spa, conference, catering and other related services.

- Service providers. Globe Runner entrusts third-party companies with providing services and products on our behalf and may transfer your personal data to them, as the case may be. As a rule, our contracted service providers shall protect your personal information and may not otherwise use or transfer your personal data, unless required by law. At the same time, if service providers reveal a fraud, they may use, however not provide your personal data to reveal a fraud. Globe Runner may also involve service providers in reporting news and delivering you promotional and business materials on our behalf, including personalized advertising in the Internet and mobile apps in accordance with your preferences and the applicable law. We cooperate only with companies that provide an opportunity to unsubscribe. We can also exchange information with service providers in order to help you develop routes by choosing websites, events, and restaurants on the lists we have personally prepared for you based on your preferences and third-party data.

- Commercial transactions. As the business grows, Globe Runner can sell or buy companies or assets, or terminate management of the hotel that is currently included in our brand portfolio. In view of this circumstance, our company may transfer, sell or surrender the information gathered, including, but not limited to, General Information (as defined in the Statement) and personal data to one or more affiliated or independent third-party companies under these commercial transactions. According to local laws, we will provide a notice of our intention to transfer personal data to third parties for this purpose and explain how you can pull out of such transfer.

- Additions. Moreover, Globe Runner may disclose personal data in the following cases: (I) according to the requirements of the applicable law; (II) in response to requests from government or public authorities; (III) according to the requirements of a lawsuit; (IV) to protect rights, privacy, security or ownership of Globe Runner, website visitors, guests, employees or the public; (V) to protect our rights or reduce possible loss; (VI) to comply with terms and conditions set forth on our websites; (VII) in case of emergency.

5. General information

When you visit and use our websites and applications, Globe Runner collects other information which does not identify you personally but refers to your use of our website, such as the pages you visit and frequency (General Information). Globe Runner uses General Information as well as data received from third-party companies to deliver you an advertising by e-mail, via the Internet (on our and other websites), and mobile apps. Globe Runner uses cookies and other technologies (such as point markers, web beacons, transparent GIFs, links in emails, JavaScript, device identifiers assigned by Google or Apple, or other similar technologies) to collect such information. You can also delete cookies from your computer or block them at any time by changing your browser settings (information on about how to delete or block cookies can be found in the browser's Help menu). Globe Runner is not responsible for setting up your browser. You can find simple and understandable cookie-file instructions for different types of web browsers at www.allaboutcookies.org.

Note for individuals residing in the European Economic Area and the United Kingdom: If you are staying in Europe, you can also customize your cookie preferences in section "Cookie Settings" by using Cookie Consent Manager to be found in Cookie Preferences.

Globe Runner can use collected and accumulated information or anonymous personal data received from third parties to get a better idea of our users (for example, we may use aggregated information to calculate the percentage of our users who have a specific telephone city code). These include demographic data, such as birth date, sex and marital status, alleged commercial interests, such as your favorite products or hobbies, as well as other information we may receive from you or from third parties.

Since General Information does not identify you, Globe Runner may disclose this information in any legally prescribed cases. In some cases, we may combine General Information with personal data. If General Information is added to personal data, we will treat this kind of information as personal data in accordance with the rules of this Statement.

6. Confidential information

The term "confidential information" means information related to your race or nationality, political, religious or philosophical beliefs, membership in the trade unions, health, sexual life and orientation, genetics, criminal history, as well as any unique biometric data used for identification purposes. In some jurisdictions, mobile phone numbers, location data, and certain information stated in ID's are also considered confidential.

Globe Runner does not usually collect confidential information if it is not voluntarily provided by you or if it is not required by the applicable laws or regulations. We can use information about health provided by you to ensure a higher level of service that best meets your needs (for example, provide a room for people with disabilities).

7. Personal data received from children

Globe Runner does not intentionally collect personal data on persons under 18. If you are a parent or guardian, do not allow your children to give personal data without your permission.

8. Links to the websites and services of third-party companies

Our website and mobile applications may contain links to third-party websites. Please note that our company does not bear responsibility for collection, use and management of these data, as well as provision or disclosure of data and information by these third-party companies. If you provide information onto the websites of third-party companies, such information is subject to privacy policy and service terms applicable on these websites. Before providing personal data on the websites, we advise you to read their privacy policy.

Globe Runner can also cooperate with a limited number of Internet providers that offer free Internet access to our guests. Your use of the Internet in Globe Runner shall be governed by the rules of use and privacy policy of the third-party Internet provider. You can read these terms and conditions using the link to a login page or visiting the Internet provider's website.

9. Personal data protection

Globe Runner will take reasonable measures to: (I) protect personal data against unauthorized access, disclosure, modification or destruction; (II) monitor the accuracy and timely updating of information in appropriate cases. Our company has a reliable team of information security professionals responsible for creating, upgrading and managing Globe Runner's security program.

Globe Runner's team for global information security is responsible, in particular, for monitoring our systems for potential intrusions, reacting to potential incidents, ensuring information security in the property, analyzing and updating security controls used by our company for data protection, as well as performing information security trainings. In case of security violation incidents, our company will notify the supervisory authorities and/or customers in accordance with applicable laws or regulations.

Globe Runner also demands that our partners and service providers make all endeavors to maintain confidentiality of personal data they receive. When performing transactions in the Internet, we use adequate means of technical protection of personal data provided by you on our website. Unfortunately, there is no absolutely reliable security system or Internet data transmission system. In order to protect your confidential data, do not send us payment card numbers or any other sensitive personal data by e-mail.

10. Modification of personal data and access thereto

In legally prescribed cases, Globe Runner may provide you with available data on you and, if necessary, you may withdraw your consent to certain types of processing of your data and/or ask to modify, adjust, delete your personal data and/or suspend processing thereof. All necessary updates and modifications will be made within the period established by the applicable law and in accordance with the applicable law. If permitted by law, an appropriate fee may be charged to cover costs associated with processing of your request. Requests can be sent by e-mail to info@globerunner.house, or to a Globe Runner's employee responsible for data protection via Viber/WhatsApp: +38 099 155 77 33. In order to keep confidentiality, the response to the request will be sent to an e-mail address registered with us or otherwise provided.

In addition, under certain circumstances and in accordance with the applicable law, you may require that Globe Runner does not provide your personal data to our business partners or that we cease to use your personal data by contacting us by e-mail or at the below postal address. We will satisfy such requests in accordance with the applicable law.

11. Personal data storage

Globe Runner keeps your personal data within the time limit specified in this Statement, unless it requires a longer period of storage or unless otherwise provided by the applicable law. Within three years upon completion of your stay, we will keep your personal data collected for the purposes specified in this Statement. Other personal data shall be kept for a shorter period, if possible and if permitted by the applicable law.

We will destroy your personal data as soon as possible without an opportunity to restore or reproduce it. Personal data on paper carriers will be destroyed in a reliable way, for example, by shredding paper documents in a shredder, burning or otherwise, and personal data stored electronically will be destroyed by using the equipment that guarantees the inability to further restore or reproduce this data.

12. Selection of marketing communications

If you have provided us with your contact information (a postal address, e-mail or phone number) in accordance with your wishes and with your consent (if required), Globe Runner can inform you about our products and services or invite you to the events by e-mail, via Internet advertising, social media, WhatsApp, Viber, Telegram, by phone, text messages (including SMS and MMS), push messages, internal messages, mail, through customer support service as well as by using other means.

If you prefer not to receive electronic marketing materials from us, you can unsubscribe at any time by using the subscription cancellation option in our e-mail. Processing the request for cancellation may take up to ten business days. You can also report the refusal to receive text messages at the reception while checking in Globe Runner, during your stay and when checking out.

13. Making amendments in the Statement

From time to time, this Statement may be amended. In case of significant amendments in this Statement, the link to the updated version of the Statement will appear on the main page of our website, and if you register to use any of products or services, you will receive a message through a chosen communication channel. The date of the Statement's latest update will be indicated in this link and at the top of the document.

Any amendments in the Statement will take effect upon publication of its updated version on the website. The use of the website, any of our products and services and/or giving the consent to the updated and amended Statement means that you agree upon the revised Statement which entered into effect.

14. Contact us

Should you have any questions regarding this Statement or regarding the use of your personal data by Globe Runner, please send an e-mail to info@globerunner.house or call us by phone +38 099 155 77 33. We will answer you as soon as possible.

15. Amendments to Globe Runner's Privacy Statement

The updated version provides more detailed information on how Globe Runner collects, uses, distributes and protects personal data of our guests.

- Appendix 1 is added: "Additional provisions applicable to processing of personal data of EEA residents". Appendix 1 contains detailed information provided in accordance with Regulation (EC) 2016/679 of the European Parliament and Council of 27 April {{2016}} on the protection of individuals against processing of personal data and on the free movement of such data, commonly referred to as the "General Data Protection Regulation" (GDPR).