



SHORT TERM RENTAL AGREEMENT | VACATION RENTAL WEBSITE PRIVACY POLICY

At Segura Luxury, we are committed to working tirelessly towards maintaining our highly regarded and respected quality of service.

Segura Luxury (DBA The Gold Nests) (“We”) are further committed to ensuring that any of your Personal Data which we have with us, is protected and respected always.

Our use of your personal information is governed by this Privacy Notice and any other documents referred to in it.

WHAT DOES THIS POLICY DO?

This policy 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.

Segura Luxury is a Data Controller for the personal information that it collects and uses about you and a Processor for some data referred to us by any Third Party who you would have allowed, or enabled to use your data for a lawful purpose relating to our services. We will always treat your personal information as confidential and your personal information will only be shared with others in accordance with this Privacy Notice. We can be contacted at: vacations@seguraluxury.com

By visiting www.thegoldnests.com you are accepting and consenting to the practices described in this policy. The General Data Protection Regulations are to safeguard your personally identifiable information or personal data. This privacy notice will be regularly reviewed and updated.

We are committed to ensuring the privacy of our guests and will use information you have provided to us in the process of booking a stay in our serviced apartments in accordance with this privacy policy. We will only collect information lawfully and we will only process information lawfully.

This Privacy Notice explains:

- What personal information is
- How we collect your personal information
- The types of personal information we collect
- How we use your personal information
- The legal basis for processing your personal information
- How we share your personal information
- How long we keep your personal information
- How we keep your personal information secure
- Overseas transfers of your personal information
- Your rights in relation to your personal information

- How to make complaints and how to contact us

If we need to change the way in which your personal information is used by us, this Privacy Notice will be updated and if the changes are significant, we will advise you.

WHAT IS PERSONAL INFORMATION?

Personal information is any information that, on its own identifies you, or can be put together with any other information, can identify you or tell us something about you. This could include information such as name, email address, other contact details, date of birth, bank account details or any information about your needs or circumstances.

Some personal information is classified as “special” data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive, and we need to have further justifications for collecting, storing and using this type of personal information.

Any references to personal information in this privacy notice will include personal data, and where relevant, special categories of personal data. Much of the personal information we process is information that you or someone acting on your behalf knowingly provides to us.

This Policy also applies to the personal information about you that we receive from a third party, unless specifically covered by such third party’s privacy policy.

On this site, “Segura Luxury”, “our” and “we” each mean any permanent Segura Luxury Office or temporary location being used as such, in the United States, which collects and use your information in the manner set out in this Privacy Notice.

HOW DO WE COLLECT PERSONAL INFORMATION?

We may collect and process all or some of the following data about you when you contact us, enquire with us or interact with us. We collect information about you (which can include documents) through a variety of different methods including from you directly and from third parties.

From you directly:

You may provide personal information and /or documents by:

- Completing forms on our websites or other online platforms which ARE under our direct control or direct management
- Completing forms on our online digital e-signature platform
- By communicating with us by post, phone, email, sms text, whatsapp, messenger or similar
- By supplying documents through any of these methods

FROM THIRD PARTIES:

We may receive personal information and/ or documents about you from various third parties such as (but not limited to):

- Websites or other online platforms which are NOT under our direct control or direct management
- Booking.com
- Silverdoor
- Anyone making the booking on your behalf (such and an employer or spouse)
- Stripe
- Worldpay

CCTV: Some of the apartment buildings we operate in may have CCTV which will record your image on entering and exiting the building.

INFORMATION YOU GIVE US:

You may give us information about you by making a booking or filling in forms on our site www.thegoldnests.com ("our site") or by corresponding with us by phone, email or otherwise. This includes information you provide when you search for a serviced property, book a serviced property on our site and when you report a problem with our site. The information you give us at this point is likely to include your name, address, email address and phone number, financial and credit card information, special requirements such as those relating to any disability or medical condition which may affect the chosen arrangements and dietary restrictions (which may disclose your religious beliefs).

When you make a booking via our partner property management system – who then process this Data on our behalf you can be assured that this is via a secure <https://> connection and any details provided are stored securely in the booking system. During this process, as a guest, you would create an account which you can login to and see details of reservations, as well as your data which is held there. This can be edited by you, giving you control.

TYPES OF PERSONAL INFORMATION WE MAY COLLECT:

The types of personal information that we may collect, receive and process, includes:

- your name, gender, personal and work contact phone number(s) and email addresses, business title, date and place of birth, image, nationality, home address, and passport and visa information;
- guest stay information, dates of arrival and departure, goods and services utilized, special requests made, observations about your service preferences, phone numbers dialed, and faxes, texts and telephone messages received (if applicable);
- your credit or debit card details including billing address, and your bank account details;
- the name of your company if you are placing a business booking;
- information, feedback or content you transparently provide regarding your marketing preferences, in surveys, sweepstakes, contests, or promotional offers, or to our websites and those of third parties;
- in limited cases, information relating to the credit of customers (never without prior disclosure and authority);
- your vehicle registration number (where parking has been booked);
- the names of other guests (if over 16 years of age);
- information about your accommodation requirements such as budget, length of stay and accommodation type;
- such other information as we deem necessary and as set out in our terms of business from time to time.

When you wish to book a property with us we will ask you for the following documents:

Such documents as we deem necessary and as set out in our terms of business from time to time [this may include (but is not limited to) a copy of your passport and/or other identity document and a photograph of both sides of your payment card.

Where we require a deposit from you and/or where you add extras to your booking we may also collect the following information from you to process the payment.

- Your payment card details (although we will NOT store this information after processing your payment via one of our payment platforms)
- Full name
- Nationality: For all who are not US Citizen guests Passport number and place of issue (or other document which shows their identity and nationality)
- Details of their next destination (including the address, if known) on or before departure

PAYMENTS FOR AN APARTMENT

Subject to our right to collect payment card details as referred to above, your payment card details will normally be supplied by you directly to one of our payment platforms (such as but not limited to Stripe or Worldpay) via a secure payment link which we provide you.

Although we can access this information, we will NOT download or store this information outside of the payment platform.

Your payment card details will only be used as set out in our terms of business from time to time.

FAILED AND CANCELLED BOOKINGS

If you supply personal information and/or documents in connection with a failed and/or cancelled booking we will retain that information as set out in this privacy policy.

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); products 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 a website that we either operate or which directly processes Data on our behalf, via the other services we provide. We work closely with many third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and therefore we may receive information about you from them.

If you have booked through a third party website (such as, but not limited to Booking.com or expedia.com) we may collect the above personal information from them (as booking agent on your behalf) rather than directly from you.

If an employer spouse or other third party has booked the apartment for you we may collect the above personal information from them (as booking agent on your behalf) rather than directly from you.

In the case of indirect bookings we may still ask you directly to verify such personal information as we may deem necessary to reserve the property for you. We will only request as much Data from you that we require at certain stages in our business processes.

WHY DO WE COLLECT THIS INFORMATION?

- To provide you with products and services. Each product and service have different information requirements. Therefore, the personal data we need, and what it is needed for, can differ.
- To provide you with information about products and services that we, believe will be of interest to you. We will only do this with your consent. You can withdraw your consent at any time by changing your marketing preferences or unsubscribing using the link at the bottom of the emails we send you (this could either be an “unsubscribe” link or a “manage my preferences” link), or by sending an email to vacations@seguraluxury.com

HOW WE USE THIS INFORMATION

We will only use your personal information lawfully. We use information held about you in the following ways:

INFORMATION YOU GIVE TO US

We will use this information:

- We may use your name, address and credit/debit card details to process your serviced property booking even if this has been booked through an agent;
- We will use your details to provide you with the information, products and services that you request from us, to manage your booking, send you notifications and communicate with you generally.
- To provide you with information about other serviced property and/or services we offer that are like those that you have already purchased or enquired about;
- 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 any 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.

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).

In addition, if we are providing a service to you, or on your behalf, where we are required to do so by law, we may request a copy of your passport.

The lawful grounds (reasons) which we will typically use for processing your personal information are:

- Where we need to perform the contract between us (contractual obligation)
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation
- With your permission and agreement (consent)

Where we need to perform the contract between us:

- We use the personal information to fulfil our contractual obligation to you in supplying a serviced apartment including (but not limited to) processing your payment, organizing your key collection and check-in, and providing you with information on what to do on arrival and whilst a guest in the apartment
- Where parking has been booked we will pass your vehicle registration number onto any apartment management company and/or car park operator to ensure you can park on arrival and will not receive a parking penalty notice
- We will also pass guest names (if over 16 years of age) and contact details onto other third parties such as our administration teams, housekeeping and cleaning teams, maintenance contractors, and our security and reception teams for them to assist us in fulfilling our contractual obligation to you in supplying a serviced apartment

Where it is necessary for our legitimate interest:

We may process personal information that we hold to further our legitimate interests which may include the following activities:

- Communications with you before you make a booking and become a guest
- Communications with you after you make a booking and are a guest
- Record keeping for book-keeping, accounting, banking and tax reporting
- Occupancy and revenue reporting
- Monitoring client spend and credit
- Monitoring website performance
- Monitoring customer service performance
- Monitoring social media performance
- Debt recovery
- Fraud prevention
- Processing and replying to chargeback requests
- Processing and replying to refund requests
- Reporting guest misconduct
- Reporting suspected criminal activity, including but not limited to suspected activity involving fraud, drugs and child exploitation
- Asking you to leave a review
- Responding to a review from you

Where we need to comply with a legal obligation:

We may process personal information that we hold because we have to by law.

This may also arise where we are requested directly (or by third parties) to supply personal information to the police and/or other crime prevention and/or enforcement agencies/ authorities in connection with suspected criminal activity, including but not limited to suspected activity involving fraud, drugs and child exploitation. This may also arise where a local council requests information from us about the use of any of our apartments.

With your permission and agreement (consent):

Generally, we do not rely on consent as a legal ground (reason) for processing your personal data, other than in relation to sending marketing communications to you via post, phone, email, SMS, Whatsapp, Messenger or similar.

Marketing by Segura Luxury:

By choosing to stay with us you are expressly consenting (opting in) to receiving marketing communications from Segura Luxury (and any sister companies) before during and after the booking completes.

You have the right to stop the processing of your information for any and all direct marketing activity through all channels, or selected channels. We must always comply with your request because whenever you have given us consent to process your personal data, you have the right to change your mind and withdraw that consent at any time.

You can withdraw consent to marketing at any time by emailing us at vacations@seguraluxury.com. You can also withdraw consent to marketing by click the unsubscribe button on any marketing email you may receive from us.

Marketing by third parties:

We do not share personal data with any third party for marketing purposes, if this however should there be a circumstance where this is required we will get your separate express opt-in consent before we share your personal data with any third party for marketing purposes.

DATA SECURITY

Because the security of your personal information is important to us, Secured Socket Layer (“SSL”) software is used on our booking platform ‘Ciirus’ to encrypt the personal information that you provide to us. If your browser is SSL enabled (which most are), your transmission of personal information to this platform online will be encrypted. You can verify whether your personal information is transmitted using SSL encryption by confirming the symbol of a closed lock or solid key on the bottom bar of your browser window. Different browsers may use different symbols. You can also verify that your personal information will

be encrypted using SSL encryption by making sure that the prefix for the web address listed for that page has changed from “http” to “https”. If you do not see the appropriate symbol and the “https” prefix, you should not assume that the personal information that you are being asked to provide will be encrypted prior to transmission.

The personal information we collect from you online is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls, firewall technology and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of personal information and we are not responsible for any damages or liabilities relating to any such incidents fully permitted by law.

Where it has come to our attention and is required under law, we will notify you of any such loss, misuse or alteration of personal information that may affect you so that you can take the appropriate actions for the due protection of your rights.

LEGAL BASIS FOR PROCESSING

What is the legal basis of our data processing?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal bases to use your information;

- Where we need information to perform the contract we have with you or to provide a service for you;
- Where we are complying with a legal obligation;
- Where processing is required to carry out activities which are in Segura Luxury legitimate interests (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, including:

1. Processing that is needed for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns. This could include sending marketing information from time to time after you have engaged us to provide services or received services from us which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information. You will always have a transparent right to opt out of receiving this information at any time.

2. Processing that is necessary to improve our knowledge of the real estate sector – this may include undertaking market analysis and research so that we can better understand trends in our business sector and provide better knowledge along with more tailored and relevant services for our customers in the future.

3. Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively – this may include: verifying the accuracy of information that we hold about you and create a better understanding of you as a customer; processing for administrative efficiency purposes such as where we outsource certain administrative functions to third parties who specialize in such services; processing for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorized access or to comply with a request from you in connection with the exercise of any of your rights outlined below.

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else’s interests); and/or
- Where it is needed in the public interest or for official purposes

We may process special categories of personal information and criminal conviction information in the following limited circumstances:

- With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.

DISCLOSURE OF YOUR INFORMATION

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. We may have to share your personal information with the parties set out below:

- Our administration teams
- Our housekeeping and cleaning teams
- Our security and reception teams
- The freeholders (and/or superior leaseholders) of any building and/or apartment which we are operating from
- Our IT and system service providers
- Our card payment processors
- Our professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
- Revenue & Customs, regulators and other authorities based in the United States and other relevant jurisdictions who require reporting of processing activities in certain circumstances
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

Where we share your data with these third-parties, we ensure that:

- We only provide the information they require to perform their specific services
- They may only hold the data we provide for the exact purposes specified in our contract with them
- We ensure that they hold your data in a secure manner and that your privacy is protected at all times
- If we stop using their services, any data that they may hold (unless they have a legal obligation to retain it and/or a legitimate interest in retaining it) will be deleted. We may share your personal information with any member of our Company, and furthermore with:
 - 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).
 - Analytics and search engine providers that assist us in the improvement and optimization of our site.

We may disclose your personal information to third parties:

- If Segura Luxury LLC sells any part of the business to a third party, personal data held by it, about its customers may be one of the transferred assets, provided that the recipient is compliant with the Florida laws;
- Who act as “data processors” on our behalf, or to other organizations that perform business functions on our behalf, some of whom are outside the United States. These functions include administration, providing services (and contacting you where necessary), customer care, business management and operation, re-organization/structuring/sale of our business (or our group companies), risk assessment, security and crime prevention/ detection, research and analysis, marketing, monitoring, measuring and assessing customer purchasing preferences and trends, dispute resolution, credit checking and debt collection.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you is stored within the United States. Data is likely to be processed by staff operating outside the United States who work for us or our partners for the fulfilment of your booking, processing of your payment details or the provision of support services. We will always make sure that your data is secure and subject to the same protection as if it was being processed in the United States. By submitting your personal data, you agree to allow us to manage this transfer, storing or processing. We will of course take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. However, whilst you can rely on Segura Luxury to ensure that we will do our best to protect your personal data, you should be aware that any transmission of such data is always at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Completed Bookings

When you make a booking, we will keep any personal data you provide us indefinitely so we can comply with our contractual and legal obligations and defend any possible claims against us.

Failed or Cancelled Bookings

We will keep any personal data you provide us indefinitely so we can comply with our contractual and legal obligations and defend any possible claims against us.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

You have several rights in relation to your personal information, these include the right to:

- Be informed, via this notice or by contacting us with any queries using the details below, about how we use your personal information;
- Obtain access to your personal information that we hold;
- Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate;
- Request that we erase your personal information in the following circumstances:
 1. If Segura Luxury is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected;
 2. If Segura Luxury is relying on consent as the legal basis for processing and you withdraw consent;
 3. If Segura Luxury is relying on legitimate interests as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing;
 4. If the personal information has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation);
 5. If it is necessary to delete the personal information to comply with a legal obligation
- Ask us to restrict our data processing activities where you consider that:
 1. Personal information is inaccurate;
 2. Our processing of your personal information is unlawful;
 3. Where we no longer need the personal information, but you require us to keep it to enable you to establish, exercise or defend a legal claim;
 4. Where you have raised an objection to our use of your personal information
- Request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need to

perform our agreement with you and personal information where we are relying on consent to process your personal information;

- Object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information; and
- Not be subject to wholly automated decisions which produce legal effects, or which could have a similarly significant effect on you. Where relevant, we may ask you to indicate how you would like to receive any offers, marketing and promotional information (e.g. via email or regular mail) and whether you would be willing to participate in surveys. Once you have indicated your preferences, you can always change them.

In certain circumstances, your consent may be implied by you (e.g. where communications are required to fulfil your requests and/or where you have volunteered information for use by us). In other cases, we may seek your consent expressly in accordance with applicable laws (e.g. where the information collected is regarded to be Sensitive Personal).

UPDATING AND ACCESSING YOUR PERSONAL INFORMATION

With some limited exceptions, you have rights to access and update personal information held about you. If you want to inquire about any personal information we may have about you, you can do so by sending us a written request by letter or email to the addresses set out in the “contact” section. Please be sure to include your full name, address and telephone number and a copy of a document evidencing your identity (such as an ID card or passport) so we can ascertain your identity and whether we have any personal information regarding you, or in case we need to contact you to obtain any additional information we may require making that determination.

We will aim to provide this free of charge, in a machine-readable format, within 30 days from your application.

You may request that we correct, cancel, and/or stop processing or using personal information that we hold about you. If we agree that the personal information is incorrect, or that the processing should be stopped, we will delete or correct the personal information. If we do not agree that the personal information is incorrect we will tell you that we do not agree, explain our refusal to you and record the fact that you consider that personal information to be incorrect in the relevant file(s).

WHO SEES YOUR PERSONAL DATA?

The personal data we collect about you will be used within Segura Luxury LLC. Exactly who sees your personal data depends on the context in which you provided it.

Sometimes we’ll share your personal data with third parties outside our facilities. We may do this for the following reasons:

- If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organizations involved in crime and fraud prevention.
- To comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority.
- To enable us to process your reservation and offer you a good service.

We will only deal with third parties that we trust to treat our customers’ personal data with the same stringent controls that we apply ourselves and we will always be transparent about who may receive this.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

How long we keep your personal data depends on the context in which you provided it and the marketing preferences you have expressed. In particular:

- We will keep any personal data we need to provide you with any of the services we provide to you for the period during which that service is provided and indefinitely thereafter;
- We may keep your contact details on our mailing list for as long as we have your consent to send you marketing information - if you request an unsubscription we will remove your contact details from our marketing mailing list;
- We will keep records of any transactions you enter with us indefinitely. This is so that we can respond to any complaints or disputes that arise in that period;
- We will keep other personal data about you if it is necessary for us to do so to comply with the law.

We've implemented technology and security policies, rules and measures to protect the personal data we have under our control, both on and offline, from improper access, use, alteration, destruction and loss. We will take all reasonable steps to protect your personal information, but data can never be guaranteed as %100 secure. Please note that we will not be liable for any breach of security unless we have been negligent.

EXTERNAL LINKS

Please note that our site contains certain literature and hyperlinks to websites owned by third parties. This privacy policy covers websites owned and controlled by us only. Links to other websites and any information collected by these sites are not covered by this privacy statement.

REMEMBER! You can withdraw your consent at any time by changing your marketing preferences or unsubscribing using the link at the bottom of the emails we send you (this could either be an "unsubscribe" link or a "manage my preferences" link), or by sending an email to vacations@seguraluxury.com