
Privacy Policy

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BAFFI exists to help you explore the world and share your unique knowledge and experience with others. We are happy to help build connections between locals and visitors so that you could feel at home wherever you are. This policy explains how we use your information and protect your right to privacy.

This Privacy Policy describes how BAFFI LAB, S.R.L. and its affiliates (“we,” “us,” or “BAFFI”), process personal information that we collect through the BAFFI Platform. Depending on where you live and what you are doing on the BAFFI Platform, the supplemental privacy pages listed below may apply to you. Please follow the links and review the supplemental information provided there with information about how we process personal information for those regions and services.

This privacy policy is based on the following fundamental principles:

- we respect your privacy and apply our best effort to protect it;
- we do not collect your private data for pecuniary gain;
- we don't use your data to show you ads.
- we only collect and store the data that we need to help you create, sell and purchase Tours;
- we do not sell your private data to third parties.

IMPORTANT SUPPLEMENTAL INFORMATION

Outside of the United States. If you reside outside of the United States, such as in the European Economic Area (“EEA”), see Section “Outside the United States” of this policy below to learn about (i) the controller(s) of your personal information; (ii) legal bases, including legitimate interests, for collecting and processing your personal information, (iii) safeguards relied upon for transferring personal information outside the EEA; (iv) your rights, and (v) contact details of the controller(s) and Data Protection Officer.

California and Vermont. If you reside in California or Vermont, see Section “California and Vermont” of this policy to learn about specific privacy information that applies to you.

China. If you reside in the People’s Republic of China, which for purposes of this Privacy Policy does not include Hong Kong, Macau (“China”), see Section “China” of this policy below to learn about your rights and other specific information that applies to you.

2. DEFINITIONS

We, BAFFI – BAFFI LAB, S.R.L., its agents and affiliates.

BAFFI Website is a website hosted at www.baffi.me, other domains owned by BAFFI LAB, S.R.L., and its subdomains.

BAFFI App is a computer program designed to use BAFFI service on a user’s mobile device.

BAFFI Platform — the computer programs and their component parts (databases, etc.), including the BAFFI Website and BAFFI App.

Service —services provided through the BAFFI Platform.

A Tour – an itinerary created and posted on BAFFI Platform.

A Visitor — a person who is created on BAFFI Platform a Visitor`s profile to purchase Tours.

A Guide – a person who is created on BAFFI Platform a Guide`s profile to create and publish Tours

A Member – a Guide and/or a Visitor;

To purchase a Tour – to acquire for value a temporal right to use a Tour on a Visitor`s device or to share it with another, according to the terms of acquisition set for a specific Tour.

Content — the text information, images, audio and video materials of copyright and/or related rights published on the BAFFI Platform. Content consists of BAFFI Content and Tour Content.

Tour Content – the text information, images, audio and video materials of copyright and/or related rights posted by a Guide on the BAFFI Platform.

BAFFI Content – the text information, images, audio and video materials of copyright and/or related rights posted by a BAFFI LAB, S.R.L. or its affiliates or agents on the BAFFI Platform.

Term of Purchase – the term during which a Visitor can use the purchased Tour.

BAFFI Fee – As an agent of a Guide BAFFI withholds 20% a price of the Tour, which is set by the Guide, as remuneration. BAFFI may also charge the guide a transaction fee. For details, see the Terms of Service at <https://baffi.me/tos>

2. PERSONAL INFORMATION WE COLLECT

2.1 Information needed to use the BAFFI Platform.

We collect personal information about you when you use the BAFFI Platform. Personal information collected depends on the features you use. Without it, we may not be able to provide you with all services requested. This information includes, but is not limited to:

- **Contact Information, Account, Profile Information**, such as your first name, last name, phone number, postal address, email address, and profile photo.
- **Identity Verification and Payment Information**: such as images of your government issued ID (where permitted or required by applicable laws), your Tax ID or VAT ID number or other verification information, bank account or payment account information for payment or payout purposes.
- **If and when BAFFI publishes information that the Guide is a certified professional, a copy of the appropriate certificate or other proof may be required.**

2.2 Information you choose to share.

If you decide to share private information in Tour Content or in the section “About me” in your profile, you do it at your own risk. If you volunteer any information for publication as Tour Content or “About me” section without our request, you waive your privacy rights concerning this information. BAFFI will not protect any private information you publish in a Tour or “About me” section.

2.3 Information Automatically Collected by Using the BAFFI Platform and our Payment Services.

When you use the BAFFI Platform and Payment Services, we automatically collect the information that may include:

- **Geo-location Information.** Such as precise or approximate location determined from your IP address or mobile device’s GPS, depending on the permissions you grant to BAFFI App in your device settings. We may also collect this information when you’re not using BAFFI App if you enable this through your settings or device permissions.
- **Usage Information.** Such as the pages or content you view, searches for Tours, purchases you have made, and other actions on the BAFFI Platform.
- **Log Data and Device Information.** Such as details about how you’ve used the BAFFI Platform (including if you clicked on links to third party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you’ve viewed or engaged with before or after using the BAFFI Platform. We may collect this information even if you haven’t created a BAFFI account or logged in.
- **Payment Transaction Information.** To execute a payment you must provide your payment information to our payment processors (PayPal, Stripe, and others). The payment information may include payment instrument used, date and time of payment, payment amount, payment instrument expiration date and billing postcode, PayPal transaction information, IBAN information, your address and other related transaction details that may be required in order to process a payment or a payout. If necessary for a payment or a payout this data will be collected and processed by an appropriate payment processing service. You may review privacy policy of payment processors on their websites.

BAFFI does not receive from payment processors your full card number. Payment processors provide us with a token that represents your account, your card’s expiration date, card type and the last four digits of your card number. If you are required to provide your name and email address to the payment processor, then they also provide us with that information. As BAFFI operates in several jurisdictions, it may be obligated to keep and store for a required period of time payment transaction information received from payment processors in compliance with applicable law. BAFFI will make best reasonable efforts to secure the payment information.

BAFFI does not collect cookies for marketing purposes. Certain technical cookies may be necessary for the correct functioning of our websites and services and such information is provided in detail in [BAFFI Cookie Policy](#).

2.4 Personal Information We Collect from Third Parties.

We collect personal information from other sources, such as:

- **Third-Party Services.** If you link, connect, or login to the BAFFI Platform with a third party service (e.g. Google, iCloud or others), you direct the service to send us information such as your email address and basic profile information, as controlled by that service or as authorized by you via your privacy settings at that service.
- **Background Information.** For Members in the United States, to the extent permitted by applicable laws, we may obtain reports from public records of criminal convictions or sex offender registrations. For Members outside of the United States, to the extent permitted by applicable laws and with your consent where required, we may obtain the local version of police, background or registered sex offender checks. We may use your information, including your full name and date of birth, to obtain such reports.
- **Enterprise Product Invitations and Account Management.** Organizations that use our Enterprise products may submit personal information to facilitate account management and invitations to use enterprise products.
- **Referrals and co-travelers.** If you are invited to the BAFFI Platform such as a co-traveler on a trip, the person who invited you can submit personal information about you such as your email address or other contact information.
- **Other Sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or information to help detect fraud and safety issues from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results or fraud warnings from identity verification service providers for use in our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the BAFFI Platform, or about your experiences and interactions from our partners. We may receive health information, including but not limited to health information related to contagious diseases.

3. HOW WE USE INFORMATION WE COLLECT

FOR THE US RESIDENTS (FOR NON-US RESIDENTS SEE BELOW)

3.1 Provide, Improve, and Develop the BAFFI Platform. We use personal information to:

- enable you to access the BAFFI Platform and make and receive payments,
- enable you to communicate with other Members,
- perform analytics, debug and conduct research,
- provide customer service,
- send you messages, updates, security alerts, and account notifications,
- if you provide us with your contacts' information such as your friends or co-travellers, we may process this information: (i) to facilitate your referral invitations, (ii) to share your trip details and facilitate trip planning, (iii) for fraud detection and prevention, and (iv) to facilitate your requests or for any other purpose you authorize,
- personalize and customize your experience based on your interactions with the BAFFI Platform, your search and purchase history, your profile information and preferences, and other content you submit, and
- enable your use of our enterprise products.

3.2 Create and Maintain a Trusted and Safer Environment. We use personal information to:

- detect and prevent fraud, spam, abuse, security and safety incidents, and other harmful activity,

- study and combat any forms of discrimination.
- conduct security investigations and risk assessments,
- verify or authenticate information provided by you,
- conduct checks against databases and other information sources, including background or police checks,
- comply with our legal obligations, protect the health and well-being of our Visitors, Guides, Guides' employees and members of the public,
- resolve disputes with our Members,
- enforce our agreements with third parties,
- comply with law, respond to legal requests, prevent harm and protect our rights (see section 4.5)
- enforce our Terms and other policies, and
- in connection with the activities above, we may conduct profiling based on your interactions with the BAFFI Platform, your profile information and other content you submit to BAFFI, and information obtained from third parties. In limited cases, automated processes could restrict or suspend access to the BAFFI Platform if such processes detect activity that we think poses a safety or other risk to BAFFI, our community, or third parties. If you would like to challenge the decision made based on the automated process, please contact us via the Contact Information section below.

3.3 Provide, Personalize, Measure, and Improve our Advertising and Marketing. We may use personal information to:

- send you promotional messages, marketing, advertising, and other information based on your preferences and social media advertising through social media platforms,
- personalize, measure, and improve our advertising,
- administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by BAFFI or its third-party partners,
- analyze characteristics and preferences to send you promotional messages, marketing, advertising and other information that we think might be of interest to you, and
- invite you to events and relevant opportunities.

3.4 Provide Payment services. Personal information is used to enable or authorize third parties to use Payment Services:

- Detect and prevent money laundering, fraud, abuse, security incidents.
- Conduct security investigations and risk assessments.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce the Payment terms and other payment policies.
- With your consent, send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences.
- Provide and improve the Payment Services.

4. SHARING & DISCLOSURE.

FOR THE US RESIDENTS (FOR NON-US RESIDENTS SEE BELOW)

4.1 Sharing With Your Consent or at Your Direction.

Where you provide consent, we share your information as described at the time of consent, such as when authorizing a third-party application or website to access your BAFFI account or participating in promotional activities by BAFFI partners or third parties.

Where permissible with applicable law, we may use certain information about you, such as your email address, de-identify it, and share it with social media platforms, to generate leads, drive traffic to BAFFI or otherwise promote our products and services.

4.2 Sharing Between Members.

To help facilitate purchases or other interactions between Members, we may need to share certain information such as:

- When a dispute is submitted, certain information may be shared between Visitor(s) and Guide(s), including profile, name, cancellation history, review information, dispute outcome and other information you choose to share and submit.
- When you as a Visitor invite additional Visitors to a tour, your full name, email address, phone number, details of the tour, and other related information will be shared with each additional Visitor.

4.3 Information You Publish in Profiles, Tours, and other Public Information.

If you are a Guide, the following information may be visible to other Members:

- Your public profile page, which includes your profile photo, first name, description that you choose to provide.
- Tour pages that include information about the tours you offer and additional information you choose to share.
- Ratings and reviews

We may display parts of your public profile and any other content you make available to the public.

Information you publish to be visible to other Members is considered public information. BAFFI will not protect any private information you published to be visible to other Members.

Information you share publicly on BAFFI Platform may be indexed through third-party search engines.

4.4. Complying with Law, Responding to Legal Requests, Preventing Harm and Protecting our Rights.

We may disclose your information to courts, law enforcement, governmental or public authorities, tax authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or where disclosure is reasonably necessary: (i) to comply with our legal obligations, (ii) to comply with a valid legal request or to respond to claims asserted against BAFFI, (iii) to respond to a valid legal request relating to a criminal investigation to address alleged or suspected illegal activity, or to respond to or address any other activity that may expose us, you, or any other of our users to legal or regulatory liability, (iv) to enforce and administer our agreements with Members, or (v) to protect the rights, property or personal safety

of BAFFI, its employees, its Members, or members of the public. For example, if permitted due to the forgoing circumstances, Guide tax information may be shared with tax authorities or other governmental agencies.

Where appropriate, we may but we are not obliged to notify Members about legal requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon or harm to BAFFI, our Members, or expose BAFFI to a claim of obstruction of justice.

For jurisdictions where BAFFI is obligated to facilitate the collection and remittance of Taxes where legally permissible according to applicable law, we may disclose Guides' and Visitors' information about transactions to the applicable tax authority, such as Guide's name, transaction dates and amounts, tax identification number(s), the amount of taxes received (or due) by Guides from Visitors, and contact information.

In jurisdictions where BAFFI facilitates or requires a registration, notification, permit, or license application of a Guide with a local governmental authority through BAFFI in accordance with local law, we may share information of participating Guides with the relevant authority, both during the application process and, periodically thereafter, such as the Guide's full name and contact details, tax identification number, tour details, and number of tours purchased.

4.5 Service Providers.

We share personal information with affiliated and unaffiliated service providers to help us run our business, including service providers that help us: (i) verify your identity or authenticate your identification documents if required by law, (ii) check information against public databases, (iii) conduct background or police checks, fraud prevention, and risk assessment, (iv) perform product development, maintenance and debugging, (v) allow the provision of the BAFFI Services through third-party platforms and software tools (e.g. through the API integration), (vi) provide customer service, advertising or payment services, (vii) process, handle or assess Members' or third party claims, or (viii) facilitate non-profit and charitable activities consistent with BAFFI's mission. These providers are contractually bound to protect your personal information and have access to your personal information to perform these tasks.

4.6 Business Transfers.

If BAFFI undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred and becomes subject to a different privacy policy.

5. OTHER IMPORTANT INFORMATION

5.1 Analyzing your Communications.

We may review, scan, or analyze your communications on the BAFFI Platform for reasons outlined in the "How We Use Information We Collect" section of this policy, including fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, analytics, enforcing our Terms of Service, and customer support purposes. For example, as part of our fraud prevention efforts, we may scan and analyze messages to mask

contact information and references to other sites. In some cases, we may also scan, review, or analyze messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible. Occasionally we may need to manually review communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyze your messaging communications to send third-party marketing messages to you and we will not sell reviews or analyses of these communications.

5.2 Third-Party Partners & Integrations.

Parts of BAFFI may link to third-party services, not owned or controlled by BAFFI, such as Google Maps/Earth, iCloud and others. Use of these services is subject to the privacy policies of those providers. BAFFI does not own or control these third parties and when you interact with them you are providing your information to them.

6. YOUR RIGHTS

You can exercise any of the rights consistent with applicable law.

6.1 Managing Your Information.

You can access and update some of your personal information through your Account settings. You are responsible for keeping your personal information up to date.

6.2 Data Access and Portability.

In some jurisdictions, applicable law may entitle you to request certain copies of your personal information or information about how we handle your personal information, request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format, and/or request that we transmit this information to another service provider (where technically feasible).

6.3 Data Erasure.

In certain jurisdictions, you can request that your personal information be deleted. Please note that if you request the erasure of your personal information:

- We may retain your personal information as necessary for our legitimate business interests, such as prevention of money laundering, fraud detection and prevention, and enhancing safety. For example, if we suspend your BAFFI Account for fraud or safety reasons, we may retain information from that BAFFI Account to prevent that Member from opening a new BAFFI Account in the future.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, BAFFI and BAFFI Payments may keep information for tax, legal reporting and auditing obligations.
- Information you have shared with others (e.g., Reviews, forum postings) will continue to be publicly visible on BAFFI, even after your BAFFI Account is cancelled. Some copies of your information (e.g., log records) will remain in our database, but are disassociated from personal identifiers.
- Because we take measures to protect data from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

7. SECURITY

While no organization can guarantee perfect security, we are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration.

8. CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time in accordance with applicable law. If we do so, we will post the revised Privacy Policy and update the “Last Updated” date at the top. In case of material changes, we will also provide you with notice of the modification by email at least thirty (30) days before the effective date. If you disagree with the revised Privacy Policy, you can cancel your Account. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of the BAFFI Platform will be subject to the revised Privacy Policy.

9. CONTACT INFORMATION AND RESPONSIBLE BAFFI ENTITIES

For questions or complaints about this Privacy Policy or BAFFI’s handling of personal information contact BAFFI LAB, S.R.L. dataprivacy@baffi.me; (ii) for payments related matter please use the contact information provided in Terms of Service.

Outside of the United States

1. APPLICATION

This subpage (“**Subpage**”) applies if you reside outside the United States and supplements our Privacy Policy. It contains important information we are required by the General Data Protection Regulation (“**GDPR**”) to disclose, including (i) the controller(s) of your personal information; (ii) legal bases, (iii) your legal rights, (iv) safeguards we rely on for transferring your personal information outside the EEA; and (v) the contact details of the controller and Data Protection Officer. This page also contains important information about the Controller (defined below) and the information processed in connection with the Payments Services. Please read this page carefully. If you have any questions, you can contact us at the details below.

2. WHO CONTROLS MY PERSONAL INFORMATION

2.1 Controller

Where this Subpage mentions “**BAFFI**,” “**we**,” “**us**,” or “**our**,” it refers to BAFFI LAB, S.R.L. that is responsible for your information under this Privacy Policy (the “**Controller**”).

2.2 Controller

The Privacy Policy also applies to the payment services pursuant to Terms of Service (“**Payment Services**”).

When using the Payment Services, you will also be providing your personal information to BAFFI LAB, S.R.L.

2.4. Contact Us

To contact the Controller contact BAFFI LAB, S.R.L. at dataprivacy@baffi.me.

3. PROCESSING OF PAYMENT INFORMATION

3.1 Information Necessary For Use of Payment Services

The Controller needs to collect the following information necessary for the adequate performance of the contract with you and to comply with applicable law (such as anti-money laundering regulations). Without it, you will not be able to use Payment Services:

- **Payment Information.** When you use the Payment Services, the Controller requires certain financial information (such as your bank account, PayPal account or credit card information.) in order to process payments and comply with applicable law.
- **Identity Verification and Other Information.** The Controller may require identity verification information (such as images of your government issued ID document(s), passport, national ID card, tax ID or driving license) or other authentication information (such as your date of birth, your address, email address, phone number) and other information in order to verify your identity, provide the Payment Services to you, and to comply with applicable law.

3.2 How the Controller Uses Personal Information Collected

We may use the personal information as a part of Payment Services to:

- Enable or authorize third parties to provide Payment Services to Members via BAFFI Platform
- Detect and prevent money laundering, fraud, abuse, security incidents
- Conduct security investigations and risk assessments
- Comply with legal obligations (such as anti-money laundering regulations)
- Enforce the Payment Terms and other payment policies
- With your consent, send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences
- Provide and improve the Payment Services

4. LEGAL BASES FOR PROCESSING PERSONAL INFORMATION

We process personal information for the purposes described in the **Privacy Policy** in line with the lawful bases set out below. For more information on the processing activities, please refer to the relevant section of the Privacy Policy.

4.1 Processing of Payments Information (Section 3, this Subpage)

SUB-SECTION	LEGAL BASES
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How the Controller uses the personal information collected	The Controller processes personal information given its legitimate interest in improving the Payment Services and Members' experience with it, and where it is necessary for the adequate performance of the contract with you and to comply with applicable laws.
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4.2 How We Use Information We Collect (Section 3 of Privacy Policy)

SUB-SECTION	LEGAL BASES
Provide, improve, and develop BAFFI.	We process this personal information for these purposes given our legitimate interest in improving BAFFI and our users' experience with it, and where it is necessary for the adequate performance of the contract with you.
Create and maintain a trusted and safer environment.	We process this personal information for these purposes given our legitimate interest in protecting BAFFI and our users, to measure the adequate performance of our contract with you, to comply with applicable laws, for the protection of your or another person's vital interests, and for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health.
Provide, personalize, measure, and improve our advertising and marketing.	We will process this personal information with your consent or based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of interest to you.
How the Controller uses the personal information collected	The Controller processes this personal information given its legitimate interest in improving the Payment Services and its users' experience with it, and where it is necessary for the adequate performance of the contract with you and to comply with applicable laws.

4.3 Complying with Law, Responding to Legal Requests, Preventing Harm and Protecting our Rights

(Section 4.5. of Privacy Policy)

SUB-SECTION	LEGAL BASES
Complying with Law, Responding to Legal Requests, Preventing Harm and Protecting our Rights.	These disclosures may be necessary to comply with our legal obligations, for the protection of a person's vital interests, for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health, for reasons of substantial public

interest, or for the purposes of BAFFI's or a third party's legitimate interest in keeping BAFFI secure, preventing a breach of the law, harm or crime, enforcing or defending legal rights, claims, or obligations, facilitating the collection of taxes and prevention of tax fraud or preventing loss or damage.

4.4 Other important information (Section 5. of Privacy Policy)

SUB-SECTION	LEGAL BASES
Analyzing your communications.	These activities are carried out based on BAFFI's legitimate interest in ensuring compliance with applicable laws and our Terms, preventing fraud, promoting safety, and improving and ensuring the adequate performance of our services.
Linking third party accounts, Third Party Partners & Integrations	We process personal information from linked third party accounts, third party partners, and integrations to the extent necessary to ensure the adequate performance of our contract with you, or to ensure that we comply with applicable laws, or with your consent.

5. YOUR RIGHTS

Pursuant to applicable law, you benefit from a number of rights. While some of these rights apply generally, certain rights apply only in certain limited cases. Please note that we may ask you to verify your identity and request before taking further action on your request.

5.1 Data Access and Portability

You have the right to request certain copies of your personal information held by us. In certain instances, you also have the right to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

5.2 Rectification

You have the right to ask us to correct inaccurate or incomplete personal information about you (and which you cannot update yourself within your BAFFI account).

5.3 Erasure

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us, to comply with our legal obligations, and as permitted by applicable law.

You have the right to ask us to delete your personal information, subject to certain limitations and restrictions. Please note that if you request the erasure of your personal information:

- We may retain your personal information as necessary for our legitimate business interests, such as prevention of money laundering, fraud detection and prevention and enhancing safety. For example, if we suspend an BAFFI account for fraud or safety reasons, we may retain information from that BAFFI account to prevent that Member from opening a new BAFFI account in the future.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, BAFFI and BAFFI Payments may keep your information for tax, legal reporting and auditing obligations.
- Information you have shared with others (e.g., Reviews, forum postings) will continue to be publicly visible on BAFFI, even after your BAFFI account is cancelled. However, attribution of such information to you will be removed.
- Some copies of your information (e.g., log records) will remain in our database, but are disassociated from personal identifiers.
- Because we maintain BAFFI to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

5.4 Withdrawing Consent

If we are processing your personal information based on your consent you can withdraw your consent at any time by changing your account settings or by sending a communication to BAFFI specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.

5.5 Restriction of Processing

You have the right to limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the personal information for the establishment, exercise or defense of legal claims; or (iv) you have objected to the processing pursuant to Section 5.6 (below) and pending the verification whether the legitimate grounds of BAFFI override your own.

5.6 Objection to Processing

You have the right to object to the processing of your personal information based on grounds specific to your situation if such processing is for direct marketing or is for a purpose based on a legitimate interest or public interest. If you object to processing based on legitimate or public interests we will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or where the processing is otherwise required for the establishment, exercise or defense of legal claims.

Where your personal information is processed for direct marketing purposes, you may, at any time ask BAFFI to cease processing your data for these direct marketing purposes by sending an e-mail to dataprivacy@baffi.me

5.7 Lodging Complaints

You have the right to lodge complaints about our data processing activities by filing a complaint with our Data Protection Officer who can be reached by the “Contact Us” section above or with

a supervisory authority, either your local supervisory authority or our lead supervisory authority, the Irish Data Protection Commission.

6. RETENTION

We retain personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- the length of time we have an ongoing relationship with you and provide BAFFI to you (for example, for as long as you have an account with us or keep using BAFFI);
- whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and/or
- whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

7. OPERATING GLOBALLY & INTERNATIONAL TRANSFERS

To facilitate our global operations BAFFI and BAFFI Payments may transfer, store, and process your information within our family of companies, partners, and service providers based in Europe, India, Asia Pacific and North and South America. Laws in these countries may differ from the laws applicable to your country of residence. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in these other countries may be entitled to access your personal information.

Some of these countries are subject to a European Commission adequacy decision. For other countries, measures have been taken pursuant to applicable data protection law, such as standard contractual clauses within BAFFI or with the relevant third party to protect this personal data.

7.1 Other Means to Ensure an Adequate Level of Data Protection

We will provide further information on the means to ensure an adequate level of data protection, such as a copy of the EU Model Clauses, on request made to BAFFI LAB, S.R.L. by emailing dataprivacy@baffi.me

California and Vermont

If you reside in California or Vermont this page applies to you and supplements the BAFFI Privacy Policy.

1. CALIFORNIA AND VERMONT RESIDENTS

BAFFI Payments will not share information it collects about you with its affiliates or third parties (both financial and non-financial), except as required or permitted by your state's law.

2. CALIFORNIA PRIVACY RIGHTS

California law permits Members who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those third parties. You may send such requests to BAFFI LAB, S.R.L. at dataprivacy@baffi.me. BAFFI do not share personal information with third parties for their own direct marketing purposes without your prior consent. Accordingly, you can prevent disclosure of your personal information to third parties for their direct marketing purposes by withholding consent.

Effective January 1, 2020, the California Consumer Privacy Act (CCPA) allows California residents, upon a verifiable consumer request, to request that a business that collects consumers' personal information to give consumers access, in a portable and (if technically feasible) readily usable form, to the specific pieces and categories of personal information that the business has collected about the consumer, the categories of sources for that information, the business or commercial purposes for collecting the information, and the categories of third parties with which the information was shared. For more information about how we collect, use, and disclose personal information for business purposes, please review our Privacy Policy. California residents also have the right to submit a request for deletion of information under certain circumstances. Consistent with California law, if you choose to exercise your rights, we won't charge you different prices or provide different quality of services unless those differences are related to your information. See EXERCISE OF DATA SUBJECT RIGHTS SECTION below for information on data subject rights requests and how to submit a request. Please note that you must verify your identity and request before further action is taken. As a part of this process, government identification may be required. Consistent with California law, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requestor's valid government issued identification, and the authorized agent's valid government issued identification.

We do not sell personal information to third parties. We do allow third parties to collect personal information through the BAFFI Platform and share personal information with third parties for the business purposes described in the Privacy Policy including without limitation advertising and marketing on the BAFFI Platform and elsewhere based on users' online activities over time and across BAFFI, services, and devices.

3. YOUR RIGHTS

Please refer to the "Your Rights" section of the Privacy Policy.

China Supplemental Privacy Policy

In the event of any conflict or inconsistency between the BAFFI the Privacy Policy and this China Supplemental Privacy Policy, this China Supplemental Privacy Policy will control to the extent of the conflict.

1. THE BAFFI PLATFORM SERVICES AND THE INFORMATION WE COLLECT

We collect the personal information described in the Privacy Policy to enable the delivery of the BAFFI Platform to you. Below we explain how we use your personal information to deliver specific features and services available through the BAFFI Platform.

FUNCTION	PERSONAL INFORMATION REQUIRED	ESSENTIALITY OF DATA / CONSEQUENCE IF NOT PROVIDED
Core Functions: Without your personal information, we may not provide the services requested.		
Account Registration	<ol style="list-style-type: none"> 1. Your name, profile photo, email address, phone number and password; or 2. Where you link, connect, or login to BAFFI with a third-party service such as WeChat, your registration, friends list, and profile information. 	You may not create your BAFFI account or buy or offer any tour, but you may still browse the tours on BAFFI as a visitor.
Browsing and Searching Tour	Your log data and device Information such as details about how you've used BAFFI (including if you clicked on links to third party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you've viewed or engaged with before or after using BAFFI.	Information automatically collected by us when providing browsing and searching services to you (such as displaying a Tour page).
Purchase A Tour	Your name, phone number, email address, details of passport or national ID (including passport/national ID numbers and expiry dates) and purchase records.	We may not be able to complete your purchase on BAFFI.
Payment for Purchase	Your bank account or payment account such as Alipay user ID, date and time, payment amount, payment instrument expiration date and billing postcode, your address, IP address and other related transaction details.	We may not process your payment and complete the transactions.
Providing A Tour and Creating Tours	Your name, phone number, TAX ID details and information relating to the Tour (e.g., address), and we will also automatically collect purchase information relating to the Tour, such as visitor details as set out above in purchase A Tours,	You may not create your Tour on BAFFI.

	purchase dates, and payment amounts.	
Messaging	Your name, profile picture and message content.	Automatically collected if you use messaging services.
Guide/Visitor Review and Rating	Your name, profile picture, review content and rating, and the pictures you uploaded on BAFFI.	Automatically collected by us if you review and rate a Guide/Visitor.
Customer Support	Account information (e.g. name, email address and phone number) and identity information (e.g. passport/ID details), your communications or call records with us, purchase information , and other information provided by you to illustrate the relevant matters.	Automatically collected by us when providing customer support to you or communicate with you.
Maintain Trust and Safety	Your account information, browsing, searching and purchase records , device information, IP address and Geo-location information (if you turn on location permission of your mobile device), log data, and your identity information (e.g. passport/ID details), background check results and fraud warning from third-party service providers and partners (such as identity verification service providers).	Information we collect to maintain trust and safety (such as to detect fraud and safety issues, conduct security investigations and risk assessments, verify or authenticate information or identifications).
<p>Ancillary Functions: Without your personal information, we may not provide you enhanced or personalized user experience, send you advertising or marketing information, or improve our products and services, but you may still use other functions of our services.</p>		
Update Your Profile	Your gender, date of birth, self-introduction, country or region of residence, school name, employer name, preferred language, business email, and other information you voluntarily provide to us.	You cannot show such information in your profile and enjoy more personalized services.
Location-based Service	Geo-location information (if you turn on the location permission on your mobile device).	You may not receive our location-based recommendation.
Emergency Contact	Name, language preferred, email address, phone number of your emergency contact and his/her	You may not be able to set up an emergency contact.

	relationship with you to us.	
Friend Invitation	Your address book contacts.	You may not invite or refer friends to use BAFFI (as Visitor, Guide or Co-guide).
Communication with Us	Information you voluntarily provide when you fill in a form, respond to surveys, post to community forums, participate in promotions, communicate with our customer care team, or share your experience with us.	You may not complete the communication with us.
Marketing and Advertising	Your phone number, email address and device information.	You will not receive our marketing and promotion email or message if you unsubscribe such information.
Improving Our Services	Your usage information (including the details about the page-views such as time to visit, pages viewed and duration), App list on your mobile device, log data and device information as well as your information captured by cookies and Similar Technologies as described in our Cookie Policy.	The usage information, log data and device information are also required to support certain core functions. You may change your Cookie setting as indicated in our Cookie Policy if you refuse to provide such cookie data.

2. DEVICE PERMISSIONS WE REQUEST

Our mobile application will request the following device permissions, which may collect your personal information.

DEVICE PERMISSION WE REQUEST AND FUNCTIONS IT SUPPORTS	PERSONAL INFORMATION CONCERNED	HOW TO TURN OFF	CONSEQUENCE IF YOU TURN OFF SUCH PERMISSION
Location To display Tours relative to your location; To display your position on the map relative to the Tour itinerary	Precise Location (GPS Location)	You may turn off through the “Privacy” or	Your location cannot be automatically indicated, but you can still choose your location

		<p>“Settings” of your device</p>	manually.
<p>Camera To take pictures, videos using the BAFFI App for the tours and profile picture and upload that media to BAFFI Cloud, as well as for identity verification for the devices that support it.</p>	<p>Photos, videos and selfie</p>		<p>You may not record media using the BAFFI App or complete identity verifications if required using the BAFFI App. However, you may still take photos or record video content using your device outside of the app and upload it.</p>
<p>Microphone To create audio recordings for the tours using the BAFFI App.</p>	<p>Audio recordings created using the device microphone</p>		<p>You may not create and upload audio files to BAFFI Platform using BAFFI App. However, you can still record such media outside of the BAFFI App and upload it.</p>
<p>Device ID To display Tours, maintain trust and safety and improve our services</p>	<p>Hardware and software information, operating system version, system language, CPU model, device unique identifier (IMEI, IMSI, MAC Address), device event information, crash data, etc.)</p>		<p>You may still use our services but the efficiency and accuracy of these functions would be adversely affected.</p>
<p>Local Storage 1. To cache the application data in your device and read such cache data to provide our services and enhance user experience 2. Access to the local storage is required in</p>	<ol style="list-style-type: none"> 1. Application data cached in your device (including account information, Tour information and log data) 2. Local device media storage (photos/videos/audio recordings) 		<ol style="list-style-type: none"> 1. Such information is essential to the basic functions of our services. You may not use such basic functions of

<p>order to upload various media (photo/video/audio) to the BAFFI App/Cloud.</p>			<p>our services if you turn off the local storage permission.</p> <p>2. You will not be able to upload your locally stored media to BAFFI App/Cloud.</p>
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3. INTEGRATION OF THIRD-PARTY SDK OR API

We share personal information with affiliated and unaffiliated service providers to help us operate our business, including integrating with our Application Programming Interface (“API”) to provide or support part of the BAFFI Services. These providers have access to your personal information necessary to perform these tasks and are required to protect your personal information.

Parts of BAFFI may also link to third-party services, not owned or controlled by BAFFI, for example, the third-party Software Development Kit (“SDK”) or API integrated with BAFFI platform to provide particular services or product features, such as, Amap). Some of them may require your personal information to provide their services such as your location or device information. Use of their services are subject to their terms of service and their respective privacy policy will apply.

We may perform technical inspection, testing and behavioral audits on such third-parties from time to time and require that they commit to compliance with applicable laws, regulations and agreements with us.

4. YOUR RIGHTS

4.1 Right to Access and Rectification

You may access your information or rectify any inaccurate information at any time by logging into your BAFFI account and update it by yourself. You may click into “personal information to view and update your information such as your name, gender, date of birth and other personal information listed. On our mobile application, you may view and update your personal information by the following steps, click “me” → “show profile” → “edit”.

4.2 Right to Delete Account

You may delete your BAFFI account by sending an email at support@baffi.me with the appropriate request. We may contact you in order to verify the authenticity of your request.

4.3 Right to Delete Your Information

You may delete your profile information by the following steps, click “Profile” → “Personal Data”. You may also request us to delete your personal information through the link set out in Section 6 “Complaints and Contacts” below if:

- the personal information was collected without your consent;
- the personal information was processed in violation of applicable laws, regulations and agreements;
- we cease operation of BAFFI. Under this circumstance, we will provide notice by reasonable means as soon as possible.

Upon receipt of your request, we will delete your relevant personal information promptly, unless otherwise required by applicable laws to retain.

4.4 Withdraw Your Consent

To the extent required by applicable laws and regulations, you may withdraw your consent to collection and processing your information by the following methods:

- Go to “me”, “setting” and “notification” to unsubscribe our marketing emails, messages, reminders or other notifications information.
- Go to the “Privacy” or “Settings” on your device to turn off the permissions granted to us.

5. SECURITY MEASURES

Without prejudice to the generality of BAFFI Privacy policy we use a variety of security technologies and procedures, such as firewall, encryption, and access control, to prevent loss, misuse, unauthorised access or disclosure of your personal information. We also implement administrative measures such as designating dedicated departments or persons to protect the security of your personal information, conducting security self-assessment, and organize training to our personnel, to protect your personal information.

In the event of a security incident, we will perform our notification obligation pursuant to applicable law and to the extent required by Chinese laws, notify you of the following information: the basic information about the security incident and its potential impacts, the remedial measures we adopted, our advice to you regarding self-protection and risk mitigation. We will endeavor to notify you promptly via email, push information, messaging, etc., and in certain circumstances publish statements on BAFFI.

6. Complaints and Contacts

Questions, comments and requests regarding this policy are welcomed and should be addressed to us at dataprivacy@baffi.me

In the event that you wish to make a complaint about how we process your personal information, please contact us with your requests at dataprivacy@baffi.me and we will endeavor to process your request as soon as possible and no later than 15 business days.

EXERCISE OF DATA SUBJECT RIGHTS

Account deactivation

How to deactivate your account

When you deactivate your account, any current reservations you have as a guide or a visitor will be deemed automatically canceled by you, and the relevant cancellation policy will apply.

You can deactivate your account by contacting us via email at support@baffi.me

If you want to deactivate a tour instead of deactivating your account, you may use the appropriate function in the BAFFI App.

You can reactivate your account by contacting us via email at support@baffi.me.

Account deletion

Deleting your account is a permanent deletion of your personal data and closure of your BAFFI account. It can't be reversed.

Once your request is processed, your personal information will be permanently deleted (except for certain information that we are legally required or permitted to retain, as outlined in our Privacy Policy. This means that we'll no longer be able to provide our services to you and if you decide to use BAFFI again in the future, you'll need to set up a new account.

How to delete your account

You can delete your account and its data by contacting us via email at support@baffi.me or using the appropriate option in your personal Profile on our platform.

Data access

You can see your account information in the Profile section

Obtaining a copy of some or all of the personal data BAFFI holds about you

For a complete copy of your data, you can request a file from BAFFI Lab S.R.L by emailing us at dataprivacy@baffi.me

Data portability

Right to portability

If you exercise this right, you can request to receive certain personal data which you have provided to BAFFI in a structured, commonly used, and machine-readable format.

Exercising your right to portability

For a complete copy of your data, you can request a file from BAFFI Lab SRL by emailing us at dataprivacy@baffi.me

Opt out from marketing communications

Exercising your right to opt out from receiving marketing emails, notifications, messages, or calls

You can change your marketing preferences at any time by either clicking the "unsubscribe" link at the bottom of any marketing email.

If you are still receiving emails from BAFFI after opting out

We will continue to use the contact details you provided in order to send you notifications related to a service you have requested (ex: purchase confirmation emails, transactional emails). If you do not want to receive any notifications from BAFFI (including service messages), you'll need to de-activate or delete your BAFFI account.

Opting out of BAFFI usage of personal data for direct marketing purposes, including sharing your data with third parties for marketing purposes

If permitted under the laws of the jurisdiction where you reside, you can opt out of such direct marketing activities as outlined in Privacy Policy by sending us an email at dataprivacy@baffi.me. For opting out of marketing communications, see above.

Object to processing

How to object to BAFFI's processing of some of your personal data for certain specific purposes

If allowed under the laws of the jurisdiction where you reside, you may request that BAFFI not process your personal information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing, BAFFI will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing, or such processing is required for the establishment, exercise, or defense of legal claims.

You may exercise your rights to object to processing by sending us an email to dataprivacy@baffi.me.

Other methods to request data subject rights

You can also submit your request via postal mail to the address provided in the Contact Us Section of the BAFFI website to the attention of Legal Privacy. Providing us with the following information will help with processing your request:

- Subject: "Privacy Data Subject Right Request"
- Your specific BAFFI ID (the email address you use to log in and use our service)

- Country of residence