



## PRIVACY POLICY

Last Updated: December 9, 2022

Welcome to Teepee's Privacy Policy. Thank you for taking the time to read it.

Teepee was created to connect businesses and creators, to make it easier to collaborate and share services, to help both parties grow. Hence our mantra:

Connect. Share. Grow.

Our mission is to make creator-based marketing easily accessible for everyone, but to do that we need a platform that people can trust. Our community is based on trust; trust between businesses and creators, trust between our member and us. We appreciate that you trust us with your information, and we intend to always keep that trust. This starts with making sure you understand the information we collect, why we collect it, how it is used and your choices regarding your information. This Privacy Policy describes how Teepee and its affiliates ("**we**," "**us**," or "**Teepee**"), process personal information in relation to your use of the Teepee Platform.

### 1. DEFINITIONS

Undefined terms in this Privacy Policy have the same definition as in our Terms of Service ("**Terms**").

### 2. PERSONAL INFORMATION WE COLLECT

#### 2.1 Information needed to use the Teepee Platform.

We collect personal information about you when you use the Teepee Platform. Without it, we may not be able to provide all services requested. This information includes:

- **Contact Information, Account, Profile Information.** Such as your first name, last name, phone number, email address, date of birth, city, and profile photo, some of which will depend on the features you use.
- **Identity Verification and Payment Information.** Such as images of your government issued ID (as permitted by applicable laws), your ID number or other verification information. If a copy of your ID is provided to us, we may scan, use, and store information contained in your ID to verify your identity.

#### 2.2 Information you choose to give us.

You can choose to provide us with additional personal information. This information may include:

- **Additional Profile Information.** Such as gender, preferred language(s), and personal description. Some of this information as indicated in your account settings is part of your public profile page and will be publicly visible.
- **Address Book Contact Information.** Address book contacts you import or enter manually.
- **Social Media Information.** Such as Instagram, Facebook, Tiktok, Youtube, Twitter or other social media usernames or other profile information.

- **Other Information.** Such as when you fill in a form, add information to your account, respond to surveys, post to community forums, participate in promotions, communicate with our customer care team and other Members, or share your experience with us. This may include health information if you choose to share it with us.

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

When you use the Teepee Platform and Payment Services, we automatically collect personal information. This information may include:

- **Geo-location Information.** Such as precise or approximate location determined from your IP address or mobile device's GPS depending on your device settings. We may also collect this information when you're not using the app if you enable this through your settings or device permissions.
- **Usage Information** Using the services generates data about your activity on our services, for instance how you use them (e.g., when you logged in, features you've been using, actions taken, information shown to you, referring webpages address and ads that you interacted with) and your interactions with other members (e.g., members you connect and interact with, when you exchanged with them, number of messages you send and receive).
- **Device information** We collect information from and about the device(s) you use to access our services, including hardware and software information such as IP address, device ID and type, apps settings and characteristics, app crashes, advertising IDs (which are randomly generated numbers that you can reset by going into your device' settings), identifiers associated with cookies or other technologies that may uniquely identify a device or browser.
- **Cookies and Similar Technologies as described in our 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 Teepee Platform with a third party service (e.g. Google, Facebook), you direct the service to send us information such as your registration, friends list, and profile information as controlled by that service or as authorized by you via your privacy settings at that service.
- **Background Information.** 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.** If you are invited to the Teepee Platform, 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 references, 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 Teepee 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**

#### **3.1 Provide, Improve, and Develop the Teepee Platform.** Such as to:

- enable you to access the Teepee Platform and make and receive payments,
- enable you to communicate with other Members,
- process your request,
- perform analytics, debug and conduct research,
- provide customer service, training,
- send you messages, updates, security alerts, and account notifications,
- if you provide us with your contacts' information, such as your friends, 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 Teepee Platform, your search and booking 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.** Including to:

- detect and prevent fraud, spam, abuse, security and safety incidents, and other harmful activity,
- study and combat 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 Creators, Businesses, Business' employees, and members of the public,
- resolve disputes with our Members, including sharing information with your Business or Creators about disputes related to your role as a Business or Creator,
- 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 Teepee Platform, your profile information and other content you submit to Teepee, and information obtained from third parties. In limited cases, automated processes, which analyze your account and activities on the Teepee platform as well as information in relation to activities on and off the Teepee platform that can be associated with you, could restrict or suspend access to the Teepee Platform if such processes detect activity that may pose a safety or other risk to Teepee, our community, or third parties. If you would like to challenge decisions based on automated processes, please [contact us](#).

#### **3.3 Provide, Personalize, Measure, and Improve our Advertising and Marketing.** For example 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 Teepee 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.

## **4. SHARING & DISCLOSURE**

### **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 Teepee account or participating in promotional activities by Teepee partners or third parties.

Where permissible under 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 Teepee, or otherwise promote our products and services.

### **4.2 Sharing Between Members.**

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

- When a booking request is made or booking confirmed, certain information is shared between Creator(s) and Business(s), including profile photo, name, social media account pages, review rating, and other information you choose to share and submit.
- If a dispute is submitted, certain information may be shared between Creator(s) and Business(s), including profile, name, review rating, cancellation history, review information, age of Creator (unless prohibited by applicable law), dispute outcome (when applicable), and other information you choose to share and submit.

### **4.3 Information You Publish in Profiles, Listings, and other Public Information.**

You can make certain information publicly visible to others, such as:

- Your public profile page, which includes your profile photo, first name (or initials where applicable), description, and city.
- Listing pages that include information such as the Business' location description, calendar availability, profile photo, social media account pages, and additional information you choose to share.
- Reviews, ratings, and other public feedback.
- Content in a community or discussion forum, blog, or social media post.

We may display parts of your public profile and other Content you make available to the public like Listing details on third-party sites, platforms, and apps.

Information you share publicly on the Teepee Platform may be indexed through third-party search engines. In some cases, you may opt-out of this feature in your account settings.

#### **4.4 Businesses.**

Businesses may use third-party services to help manage or deliver their services, such as cleaning services or lock providers. Businesses may use features on the Teepee Platform to share information about the Creator (like check-in and check-out dates, Creator name, Creator phone number) with such third-party service providers.

#### **4.5 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 to: (i) comply with our legal obligations, (ii) comply with a valid legal request (such as a subpoena or court order) or to respond to claims asserted against Teepee, (iii) 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) enforce and administer our agreements with Members, including our Terms and Conditions, or (v) protect the rights, property or personal safety of Teepee, its employees, its Members, or members of the public. For example, if permitted due to the foregoing circumstances, Business tax information may be shared with tax authorities or other governmental agencies.

Where appropriate, we may 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 Teepee, our Members, or expose Teepee to a claim of obstruction of justice.

Where legally required or permissible according to applicable law, we may disclose Businesses' and/or Creators' information to tax authorities for the purpose of the tax authorities' determination of proper compliance with relevant tax obligations. Relevant tax obligations include Teepee's tax obligations on its service fees, its facilitation of taxes on accommodations and withholding taxes, and Businesses' individual tax obligations. Information that may be disclosed includes, but is not limited to, Business and Creator names, listing addresses, Business addresses, tax/business identification number(s), date of birth, and/or contact information, property parcel identification numbers, payout information, transaction dates and amounts, number of nights and Creators booked, gross and net booking value and payout amounts, taxes collected by Teepee on behalf of Creators and Businesses, to the extent any of this information is known by Teepee.

In jurisdictions where Teepee facilitates or requires a registration, notification, permit, or license application or number of a Business with a governmental authority, we may share information of participating Businesses with the relevant authority, both during the application process, when the Listing is published, and periodically thereafter, such as the Businesses' full name and contact details, Accommodation address, tax identification number, registration, permit, or license number, Listing details, reservation information, and number of nights booked subject to applicable laws.

#### **4.6 Programs with Managers and Owners.**

We may share personal information of Businesses and Creators with landlords, management companies, and/or property owners ("**Building Management**"), such as booking information and information related to compliance with applicable laws, in order to facilitate programs with Building Management. For example, Creator booking and personal information, including Creator contact

information, may be shared with the Building Management of the building, complex, or community where a Business is located to facilitate Business services, compliance with applicable laws, security, and other services.

#### **4.7 Service Providers.**

We share personal information with affiliated and unaffiliated service providers to help us run our business and for their compliance purposes, including service providers that help us: (i) verify your identity or authenticate your identification documents, (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 Teepee Services through third-party platforms and software tools (e.g. through the integration with our APIs), (vi) provide customer service, advertising, or payments services, or (vii) process, handle or assess insurance claims or similar claims. These providers are contractually bound to protect your personal information and have access to your personal information to perform these tasks.

#### **4.8 Business Transfers.**

If Teepee 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 Teepee 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 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 Linking Third-Party Accounts.**

You can link your Teepee account with certain third-party services like social networks. Your contacts on these third-party services are referred to as “Friends.” When you direct the data sharing by creating this link:

- some of the information provided to us from linking accounts may be published on your public profile,

- your activities on the Teepee Platform may be displayed to your Friends on the Teepee Platform and/or that third-party service,
- a link to your public profile on that third-party service may be included in your Teepee public profile,
- other Teepee users may be able to see any Friends that you may have in common with them, or that you are a Friend of their Friend if applicable,
- other Teepee users may be able to see any schools, hometowns, or other groups you have in common with them as listed on your linked social networking service,
- information you provide to us from the linking of your accounts may be stored, processed, and transmitted for fraud prevention and risk assessment purposes, and
- publication and display of information that you provide to the Teepee Platform through this linkage is subject to your settings and authorizations on the Teepee Platform and the third-party service.

### **5.3 Third-Party Partners & Integrations.**

Parts of Teepee may link to third-party services, not owned or controlled by Teepee, such as Google Maps/Earth. Use of these services is subject to the privacy policies of those providers, such as [Google Maps/Earth Additional Terms of Use](#), [Google Privacy Policy](#) (see [here](#) for more information on how Google uses information). Teepee 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 described in this section consistent with applicable law. We may ask you to verify your identity and request before taking further action on your request.

### **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 some jurisdictions, you can request that your personal information be deleted. Please note that if you request deletion of your personal information, or if your account is suspended, terminated, or voluntarily closed:

- 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 a Teepee Account for fraud or safety reasons, we may retain information from that Teepee Account to prevent that Member from opening a new Teepee Account in the future.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, Teepee 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 Teepee, even after your Teepee 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 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 Teepee Platform will be subject to the revised Privacy Policy.

## **9. CONTACT INFORMATION AND RESPONSIBLE TEEPEE ENTITIES**

For questions or complaints about this Privacy Policy or Teepee’s handling of personal information please [contact us online](#) or contact Teepee People Pty Ltd, 2/27 Moore St, Elwood, Victoria, Australia.