

Privacy Policy

VINDER PRIVACY POLICY

Vinder (hereinafter referred to as “**Vinder**”, “**we**”, “**us**” or “**our**”) operates a platform and community marketplace that helps people form offline experiences and relationships directly with one another, where they can create, list, discover and purchase unprocessed Produce, whether through our website or our mobile applications (“**Platform**”). Vinder refers to Vinder, Inc.

This Privacy Policy is intended to inform you about how we treat Personal Information that we process about you. If you do not agree to any part of this Privacy Policy, then we cannot provide the Platform or Services to you, and you should stop accessing the Platform and deactivate your Vinder Account.

DEFINITIONS

Where the definition of a term does not appear in this Privacy Policy (such as “Listing”, “Produce”, “Content,” “Services” etc.), it shall be given its definition as outlined in our our *Terms of Service*.

“**Affiliates**” means companies related by common ownership or control. They can be financial and non-financial companies.

“**Aggregated Information**” means information about all of our users or specific groups or categories of users that we combine together so that it no longer identifies or references an individual user.

“**Data Controller**” means Vinder, the company responsible for the use and processing of Personal Information.

“**Third Parties**” means companies or persons not related by common ownership or control (i.e. non-affiliates) or other unrelated individuals. Third Parties can be financial and non-financial companies, or persons other than you and Vinder.

“**Personal Information**” means information (which may include sensitive information) relating to a living individual who is or can be identified either from that information or from that information in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller.

WHAT TYPES OF INFORMATION DOES AIRBNB GATHER ABOUT ITS USERS?

A. Information that you give us

We receive, store and process information, including Personal Information, that you make available to us when accessing or using our Platform and Services. Examples include when you:

- fill in any form on the Platform, such as when you register or update the details of your user account, or when you supply ID and other verification information;

- access or use the Platform, such as to search for or post Produce, make or accept Listings, pay for Produce, post comments or reviews, or communicate with other users;
- link your account on a Third-Party site (e.g. Facebook) to your Vinder Account, in which case we will obtain the Personal Information that you have provided to the Third-Party site, to the extent allowed by your settings with the Third-Party site and authorized by you;
- communicate with Vinder; and
- share information with another Member.

B. Information we get from your use of our Platform

We also receive, store and process information, possibly including Personal Information, when you access or use our Platform and Services, including but not limited to:

- *Mobile Data*
When you use certain features of the Platform, in particular our mobile applications we may receive, store and process different types of information about your location, including general information (e.g. IP address, zip code) and more specific information (e.g. GPS-based functionality on mobile devices used to access the Platform or specific features of the platform). If you access the Platform through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details.
- *Contact Information*
You may use your contact information, such as your email address, phone number to create or customize your account or to enable certain account features, for example, for login verification. If you provide us with your email address or phone number you agree to receive emails to that email address or text messages to that phone number, as the case may be. We may use your contact information to send you information about our Platform and Services, to market to you, and to help prevent spam, fraud, or abuse.
- *Log Data*
We may also receive, store and process Log Data, which is information that is automatically recorded by our servers whenever you access or use the Platform, regardless of whether you are registered with Vinder or logged in to your Vinder Account, such as your IP Address, the date and time you access or use the Platform, the hardware and software you are using, referring and exit pages and URLs, the number of clicks, device event information, pages viewed and the order of those pages, and the amount of time spent on particular pages.

- *Cookies and other Tracking Technologies*

Vinder uses cookies and other similar technologies, such as mobile application and other device identifiers, on the Platform. We may also allow our business partners to use their cookies and other tracking technologies on the Platform. As a result, when you access or use the Platform, you will provide or make available certain information to us and to our business partners.

While you may disable the usage of cookies through your browser settings, we do not change our practices in response to a “Do Not Track” signal in the HTTP header from your browser or mobile application. We track your activities if you click on advertisements for Vinder services on Third-Party platforms such as search engines and social networks, and may use analytics to track what you do in response to those advertisements.

We may, either directly or through Third Parties we engage to provide services to us, also continue to track your behavior on our own Platform for purposes of our own customer support, analytics, research, product development, fraud prevention, risk assessment, regulatory compliance, investigation, as well as to enable you to use and access the Platform and pay for your activities on the Platform. We may also, either directly or through Third-Parties we engage to provide services to us, track your behavior on our own Platform to market and advertise our services to you on the Platform and Third-Party websites. Third Parties that use cookies and other tracking technologies to deliver targeted advertisements on our Platform and/or Third-Party websites may offer you a way to prevent such targeted advertisements by opting-out at the websites of industry groups such as the [Network Advertising Initiative](#) and/or the [Digital Advertising Alliance](#). You may also be able to control advertising cookies provided by publishers, for example Google’s [Ad Preference Manager](#). Please note that even if you choose to opt-out of receiving targeted advertising, you may still receive advertising on or about the Platform – it just will not be tailored to your interests. In addition, if you disable cookies, you may lose some of the features and functionality of using our Platform, Application and Services, as cookies are necessary to track and enhance your use and access.

Third Parties may not collect information about users’ online activities on the Platform except as described in this policy.

- *Third-Party social plugins*

Our Platform may use social plugins which are provided and operated by Third-Parties, such as Facebook’s Like Button.

As a result of this, you may send to the Third-Party the information that you are viewing on a certain part of our Platform. If you are not logged into your account with the Third-Party, then the Third Party may not know your identity. If you are logged

into your account with the Third Party, then the Third Party may be able to link information about your visit to our Platform to your account with them. Similarly, your interactions with the social plugin may be recorded by the Third Party.

Please refer to the Third Party's privacy policy to find out more about its data practices, such as what data is collected about you and how the Third Party uses such data.

HOW VINDER USES AND PROCESSES THE INFORMATION THAT YOU PROVIDE OR MAKE AVAILABLE

A. We use, store and process information about you for the following general purposes:

- to enable you to access and use the Platform;
- to enable you to communicate with other Members, including but not limited to sending them messages;
- to operate, protect, improve and optimize the Platform, Vinder's business, and our users' experience, such as to perform analytics, conduct research, personalize or otherwise customize your experience, and to provide customer service;
- to help create and maintain a trusted and safer environment on the Platform and Services, such as detection and prevention of actual and potential fraud and other harmful activity, conducting investigations and risk assessments, enforcing our Terms and policies, verifying the address of your listings, verifying any identifications provided by you (including by comparing the photo on that identification to another photo you provide to us), and conducting checks against databases and information sources (such as but not limited to public government databases) for fraud detection and prevention, risk assessment and harm prevention purposes. In this regard, we may do any or all of the foregoing with or without further notifying you;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing, advertising, and promotional messages and other information that may be of interest to you, including information about Vinder, our services, or general promotions for partner campaigns and services. You can unsubscribe or opt-out from receiving these communications in your settings (in the "Edit Account" section) when you login to your Vinder Account;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with Third Parties.

How Vinder Uses and Processes User Communications

We may, either directly or through Third-Parties we engage to provide services to us, review, scan, or analyze your communications with other users exchanged via the Platform for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research and customer support purposes. For example, as part of our fraud prevention efforts, the Platform may scan and analyze messages and attachments to mask contact information and references to other websites. This helps to prevent fraudulent actors from asking Members to send them money outside of the Platform, such as by bank transfer or other money transfer methods. We may also scan, review or analyze messages for research and product development purposes to help make search, booking and user communications more efficient and effective, as well as to debug, improve and expand product offerings. We will not review, scan, or analyze your communications for sending Third-Party marketing messages to you. We will also not sell these reviews or analyses of communications to Third Parties. We will also use automated methods to carry out these reviews or analyses where reasonably possible. However, from time to time we may have to manually review some communications. By using the Platform, you consent that Vinder, in its sole discretion, may, either directly or through Third-Parties we engage to provide services to us, review, scan, analyze, and store your communications, whether done manually or through automated means.

BUSINESS TRANSFERS BY VINDER

If Vinder undertakes or is involved in any merger, acquisition, reorganization, sale of assets or bankruptcy or insolvency event, then we may sell, transfer or share some or all of our assets, including your Personal Information. In this event, we will notify you before your Personal Information is transferred and becomes subject to a different privacy policy.

HOW TO ACCESS, CHANGE OR DELETE YOUR INFORMATION, OR CANCEL YOUR VINDER ACCOUNT

You may review, update, correct or delete the Personal Information in your Vinder Account. If you would like to correct your information or cancel your Vinder Account entirely, you can do so by logging in to your Vinder Account. Please also note that any reviews, forum postings and similar materials posted by you may continue to be publicly available on the Platform in association with your first name, even after your Vinder Account is cancelled.

SECURING YOUR PERSONAL INFORMATION

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your Personal Information against unauthorized access, destruction or alteration. However, no method of transmission over the Internet, and no method of storing electronic information, can be 100% secure. So, we cannot guarantee the security of your transmissions to us and of your Personal Information that we store.

YOUR PRIVACY WHEN YOU ACCESS THIRD-PARTY WEBSITES AND RESOURCES

The Platform will contain links to other websites not owned or controlled by Vinder. Vinder does not have any control over Third-Party websites. These other websites may place their own cookies, web beacons or other files on your device, or collect and solicit Personal Information from you. They will have their own rules about the collection, use and disclosure of Personal Information. We encourage you to read the terms of use and privacy policies of the other websites that you visit.

CHANGES TO THIS PRIVACY POLICY

We may change how we collect and then use Personal Information at any time and without prior notice, at our sole discretion. We may change this Privacy Policy at any time. If we make material changes to the Privacy Policy, we will notify you either by posting the changed Privacy Policy on the Platform or by sending an email to you. We will also update the “Last Updated” date at the top of this Privacy Policy. If we let you know of changes through an email communication, then the date on which we send the email will be deemed to be the date of your receipt of that email.

It’s important that you review the changed Privacy Policy. If you do not wish to agree to the changed Privacy Policy, then we will not be able to continue providing the Platform and Services to you, and your only option will be to stop accessing the Platform and Services and deactivate your Vinder Account.

COOKIE POLICY

Vinder uses “cookies” in conjunction with the Platform to obtain information. A cookie is a small data file that is transferred to your device (e.g. your phone or your computer) for record-keeping purposes. For example, a cookie could allow the Platform to recognize your browser, while another could store your preferences and other information.

Your browser may allow you to set how it handles cookies, such as declining all cookies or prompting you to decide whether to accept each cookie. But please note that some parts of the Platform may not work as intended or may not work at all without cookies.

Vinder cookies and Third Party cookies

Vinder may place our cookies on your device via the Platform. Accordingly, our Privacy Policy will apply to our treatment of the information we obtain via our cookies.

We may also allow our business partners to place cookies on your device. As further explained below, Third Parties may also place cookies on your device for advertising purposes.

There are two types of cookies used on the Platform, namely “**persistent cookies**” and “**session cookies**”.

Session cookies will normally expire when you close your browser, while persistent cookies will remain on your device after you close your browser, and can be used again the next time you access the Platform.

Other technologies

The Platform may also use other technologies with similar functionality to cookies, such as web beacons and tracking URLs to obtain Log Data about users. We may also use web beacons and tracking URLs in our messages to you to determine whether you have opened a certain message or accessed a certain link.

Uses for Vinder cookies

Vinder uses cookies and similar tracking technologies for a number of purposes, such as the following:

- to enable, facilitate and streamline the functioning of the Platform across different webpages, devices and browser sessions.
- to simplify your access to and use of the Platform and make it more seamless.
- to monitor and analyze the performance, operation and effectiveness of the Platform, so that we can improve and optimize it.
- to show you content (which may include advertisements) that is more relevant to you.
- for fraud detection and prevention.

Uses for Third-Party cookies

Our partners' cookies are intended to obtain information to help them provide services to Vinder. For example, Third Parties we engage to provide services to us may track your behavior on our Platform to market and advertise Vinder listings or services to you on the Platform and Third-party websites, or to help us detect or prevent fraud or conduct risk assessments. Third Parties websites that use cookies and other tracking technologies to deliver targeted advertisements on our Platform and/or Third-Party websites may offer you a way to prevent such targeted advertisements by opting-out at the websites of industry groups such as the [Network Advertising Initiative](#) and/or the [Digital Advertising Alliance](#). You may also be able to control advertising cookies provided by publishers, for example Google's [Ad Preference Manager](#). Please note that even if you choose to opt-out of receiving targeted advertising, you may still receive advertising on or about the Platform – it just will not be tailored to your interests.

In addition, Facebook places a cookie via the Platform that allows Facebook to obtain aggregated, non-Personal Information to optimize their services. For example, if a user clicks on an

advertisement for Vidner on Facebook, this cookie will inform Facebook that a user (who is not personally identified) has clicked on the advertisement.

Disabling Cookies

Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies by visiting the Help portion of your browser's toolbar. If you choose to decline cookies, please note that you may not be able to sign in, customize, or use some of the interactive features of the Platform. Flash cookies operate differently than browser cookies, and cookie management tools available in a web browser will not remove flash cookies. To learn more about how to manage flash cookies, you can visit the the [Adobe website](#) and make changes at the [Global Privacy Settings Panel](#).

Changes to this Cookie Policy

We can change this Cookie Policy at any time. If we make material changes to the Cookie Policy, we will let you know either by posting the changed Cookie Policy on the Platform or by sending you an email.

It's important that you review the changed Cookie Policy. If you do not wish to agree to the changed Cookie Policy, then we cannot continue to provide the Platform to you, and your only option is to stop accessing the Platform and Services and deactivate your Vinder Account.