



NUEVAH PRIVACY POLICY

Last updated: May 22, 2018

This privacy policy (“Privacy Policy”) provides our policies and procedures for collecting, transferring, processing, storing, using, and disclosing your information. Clients (“you” or “your”) can access the services provided by Nuevah Sp. z o.o. (“Nuevah”, “we” or “our”) through our website and related applications and tools (the “Services”), and this Privacy Policy governs your access to the Services, regardless of what type of device or application you use to access them. By using our Services, you consent to the collection, transfer, processing, storage, disclosure and other uses of information described in this Privacy Policy. The term “Information” when used without other modifiers refers to all the different forms of data, content, and information described below.

1. COLLECTED AND STORED INFORMATION

1.1 When you register for, or access, a Nuevah account, or otherwise access the Services, we may collect some personal Information that can be used to contact or identify you (“Personal Information”), such as your name, phone number, email address, and business postal addresses. We do not collect or store any credit card or other payment information from you.

1.2 Some of Client’s computer hardware and software may automatically be collected by Nuevah. This information can include: user’s IP address, browser type, domain names, access times and referring Web site addresses. This information is used by Nuevah for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of Nuevah.

1.3 The use of Nuevah involves the use of cookies. Cookies are used to ensure proper operation of the site, including maintaining the user’s session through which the user can remain logged on the site. Cookies also help to create the site statistics. Restrictions on the use of cookies may affect some of the functionalities available on the Nuevah websites, including the prevention of its use. Cookies are IT data, in particular text files that are stored in the user’s final equipment and are designed to use the Nuevah websites. Cookies typically contain the name of the website from which they come, the time of storage on final device and a unique number.

1.4 Nuevah may allow third party integrators (“Integrators”) to create applications and/or tools that supplement or enhance the Services (the “Integrations”). If you choose to access any such Integrations, the Integrators will access (via API) and use information you provide solely for the purpose of supplementing or enhancing the Services through the Integrations.

2. HOW WE USE YOUR INFORMATION

2.1 Personal Information and data collected from cookies and other logging data may be used: (i) to provide and improve our Services and customer service, (ii) to administer your use of the Services, (iv) to personalize and improve your experience, and (v) to provide or offer software updates and product announcements. If you no longer wish to receive communications from us, please follow the “unsubscribe” instructions provided in any of those communications, or update your account settings, as applicable. We do not sell your Personal Information, Files or any other information about you to third parties.

2.2. We may also collect some Information (ourselves or by using third party services) using logging and cookies, such as IP addresses, which can sometimes be correlated with Personal Information. We use this Information for the above purposes and to monitor and analyze use of the Services, for the Services’ technical administration, customer support, to increase our Services’ functionality and user-friendliness, and to verify users have the authorization needed for the Services to process their requests.

3. INFORMATION SHARING AND DISCLOSURE

3.1 We do not sell your Personal Information, Files or other information about you to third parties. We may use certain trusted third-party companies and individuals to help us provide, analyze, and improve the Services (including but not limited to data storage, maintenance services, database management, web analytics, payment processing, and improvement of the Services’ features). These third parties may have access to your Information only for purposes of performing these limited tasks on our behalf and under obligations similar to those in our Privacy Policy. We use industry standard storage service to store your Files and other Information.

3.2 We may disclose to outside parties Files and Personal Information stored in Nuevah accounts which you access and Information about you that we collect when we have a good faith belief that disclosure is reasonably necessary to (a) comply with a law, regulation or compulsory legal request; (b) protect the safety of any person from death or serious bodily injury; (c) prevent fraud or abuse of Nuevah, its Services or its users; or (d) to protect Nuevah’s property rights. If we provide your Files to a law enforcement agency as set forth above, we will remove Nuevah’s encryption from the Files before providing them to law enforcement. However, Nuevah will not be able to access and decrypt any Files on your behalf or that you encrypted prior to storing them via the Services.

3.3 If we are involved in a merger, acquisition, or sale of all or a portion of our assets, your Information may be transferred as part of that transaction, but we will notify you (for example, via email and/or a prominent notice on our website) of any change in control or use of your Personal Information or Files, or if such Information becomes subject to a different privacy policy.

3.4 We may, at our discretion, disclose your non-private, aggregated, or otherwise non-personal Information, such as usage statistics of our Services.

3.5 If you are registered as the account user, you may review, update, correct or delete the Personal Information provided in your registration or account profile by changing the “account settings.” E-mail address submitted when creating a Nuevah account is assigned to the account forever, and it cannot be changed. If the user wants to change e-mail address, he/she should create a new Nuevah account using a new email address.

3.6 We may retain and use your Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Consistent with these requirements, we will attempt to delete your Information quickly upon request. Please note, however, that there might be latency in deleting Information from our servers and backed-up versions might exist after deletion.

3.7 You have the ability to:

- access, add, delete modify or save Files and other Information in and about your Nuevah account;
- control how your Nuevah account may be accessed, modified or deleted

3.8 The security of your Information is important to us. When you enter sensitive Information upon registration we encrypt the transmission of that Information using secure socket layer technology (SSL). We follow generally accepted standards to protect the Information submitted to us, both during transmission and once we receive it. No method of electronic transmission or storage is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our website, you can contact us at support@nuevah.com.

3.9 Access to the Nuevah account is password protected. Bear Hotel Platform does not verify the difficulty of password set by the user in order to ensure maximum quality of service. Attention is drawn to the fact that the user should take care of the password, which should have an appropriate level of difficulty (lowercase and uppercase letters + digits). The only requirement of Nuevah is the minimum password length of 8 (eight) characters.

3.10 Provisions Related to Clients and Users Residing in Europe: Nuevah complies with the provisions of the General Data Protection Regulation (“GDPR”) made effective in the EU on May 25, 2018. We are committed to protecting the security of your personal information, and we take commercially reasonable technical and organizational measures that are designed to that end.

The information can be corrected, deleted, or exported to you or a third-party of your choice, except as required by law as indicated above.

4. CONTACT

If you have any questions about this Privacy Policy, please contact us at support@nuevah.com

5. CHANGES TO THE PRIVACY POLICY

This Privacy Policy may change from time to time. If we make a change to this Privacy Policy that we believe materially reduces your rights, we will provide you with notice by email or by posting such changes on our site. We may provide notice of changes in other circumstances as well. By continuing to use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy.