

# MR LIBRARY LIMITED Privacy Policy

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## 1. INTRODUCTION

Thank you for using MRL! Your trust is important to us and we're committed to protecting the privacy and security of your personal information (for the purpose of this Privacy Policy, including the corporate information of a corporation / entity and "you" or "your" refer to individual or / and corporation / entity). The information that's shared with us helps us to provide a great experience with MRL. We committed to protecting all the personal information we collect and help ensure that personal information is handled properly worldwide.

This Privacy Policy describes how we collect, use, process, and disclose your personal information, in conjunction with your access to and use of the MRL Platform and the Payment Services. This privacy policy describes our privacy practices for all websites, platforms and services that link to it. Please read the privacy policy on the applicable site.

### 1.1 Definitions

If you see an undefined term in this Privacy Policy (such as "Listing" or "MRL Platform"), it has the same definition as in our Terms of Service ("Terms").

### 1.2 Data Controller

When this policy mentions "MRL," "we," "us," or "our," it refers to the MRL company that is responsible for your information under this Privacy Policy (the "Data Controller").

### 1.3 Applicability to Payments

This Privacy Policy also applies to the Payment Services provided to you by MRL Payments pursuant to the Payments Terms of Service ("Payments Terms"). When using the Payment Services, you will be also providing your information, including personal information, to one or more MRL Payments entities, which will also be the Data Controller (the "Payments Data Controller") of your information related to the Payment Services, generally depending on your country of residence.

If you change your country of residence, the Data Controller and/or Payments Data Controller may be determined by your new country of residence as specified above, from the date on which your country of residence changes. To this end the Data Controller and/or Payment Data Controller that originally collected your personal information will need to transfer such personal information to the new applicable Data Controller and/or Payments Data Controller due to the fact that such transfer is necessary for the performance of the contractual relationship with you.

Please see the Contact Us section below for contact details of the Data Controllers and Payments Data Controllers.

## 2. INFORMATION WE COLLECT

There are three general categories of information we collect.

### 2.1 Information You Give to Us.

#### 2.1.1 Information that is necessary for the use of the MRL Platform.

We ask for and collect the following personal information about you when you use the MRL Platform. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested services.

- **Account Information.** When you sign up for an MRL Account, we require certain information such as your first full email address, phone number etc.
- **Profile and Listing Information.** To use certain features of the MRL Platform (such as booking or creating a Listing), we may ask you to provide additional information, which may include your address, phone number, and a profile picture etc.
- **Identity Verification Information.** To help create and maintain a trusted environment, we may collect identity verification information (such as images of your government issued ID, passport, national ID card, or driving license, qualification certificates, business certificates, as permitted by applicable laws) or other authentication information.
- **Payment Information.** To use certain features of the MRL Platform (such as booking or creating a Listing), we may require you to provide certain financial information (like your bank account or credit card information) in order to facilitate the processing of payments (via MRL Payments).
- **Communications with MRL and other Members.** When you communicate with MRL or use the MRL Platform to communicate with other Members, we collect information about your communication and any information you choose to provide.

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

You may choose to provide us with additional personal information in order to obtain a better user experience when using MRL Platform. This additional information will be processed based on our legitimate interest or when applicable, your consent.

- **Additional Profile Information.** You may choose to provide additional information as part of your MRL profile (such as gender, preferred language(s), city, and a personal description). Some of this information as indicated in your Account settings is part of your public profile page, and will be publicly visible to others, as the case may be.
- **Address Book Contact Information.** If available, you may choose to import your address book contacts or enter your contacts' information manually to access certain features of the MRL Platform, like inviting them to use MRL.
- **Other Information.** You may otherwise choose to provide us information when you fill in a form, update or add information to your MRL Account, respond to surveys, post to community forums,

participate in promotions, communicate with our customer care team, share your experience with us, or use other features of the MRL Platform.

### 2.1.3 Information that is necessary for the use of the Payment Services.

The Payments Data 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 Payments Data Controller requires certain financial information (like your bank account or credit card information) in order to process payments and comply with applicable law.
- **Identity Verification and Other Information.** If you are a Professional, the Payments Data Controller may require identity verification information (such as images of your government issued ID, passport, national ID card, driving license or business certificates) or other authentication information, 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.

### 2.1.4 Information We Automatically Collect from Your Use of the MRL Platform and Payment Services.

When you use the MRL Platform and the Payment Services, we automatically collect personal information about the services you use and how you use them. This information is necessary for the adequate performance of the contract between you and us, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the functionalities of the MRL Platform and Payment Services.

- **Geo-location Information.** When you use certain features of the MRL Platform, we may collect information about your precise or approximate location as determined through data such as your IP address or mobile device's GPS to offer you an improved user experience. Most mobile devices allow you to control or disable the use of location services for applications in the device's settings menu. MRL may also collect this information even when you are not using the app if this connection is enabled through your settings or device permissions.
- **Usage Information.** We collect information about your interactions with the MRL Platform such as the pages or content you view, your searches for Listings, bookings you have made, and other actions on the MRL Platform.
- **Log Data and Device Information.** We automatically collect log data and device information when you access and use the MRL Platform, even if you have not created an MRL Account or logged in. That information includes, among other things: details about how you've used the MRL 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 MRL Platform.
- **Cookies and Similar Technologies.** We use cookies and other similar technologies when you use our platform, use our mobile app, or engage with our online ads or email communications. We may collect certain information by automated means using technologies such as cookies, web beacons, pixels, browser analysis tools, server logs, and mobile identifiers. In many cases the information we collect using cookies and other tools is only used in a non-identifiable without reference to personal information. For example, we may use information we collect to better understand website traffic patterns and to optimize our website experience. In some cases we associate the information we collect using cookies and other technology with your personal information. Our business partners may also use these tracking technologies on the MRL Platform or engage others to track your behavior on our behalf.

- **Pixels and SDKs.** Third parties, including Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from our websites and elsewhere on the internet and use that information to provide measurement services and target ads. For apps, that third parties, including Facebook, may collect or receive information from your app and other apps and use that information to provide measurement services and targeted ads. Users can opt-out of the collection and use of information for ad targeting by updating their Facebook account ad settings and by contacting [cs@mroperation.com](mailto:cs@mroperation.com) with a description of your request and validation information. For more information on our use of these technologies, see our Cookie Policy.
- **Do Not Track Signals.** While you may disable the usage of cookies through your browser settings, the MRL Platform currently does not respond to a “Do Not Track” signal in the HTTP header from your browser or mobile application due to lack of standardization regarding how that signal should be interpreted.
- **Payment Transaction Information.** MRL Payments collects information related to your payment transactions through the MRL Platform, including the payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, PayPal email address, IBAN information, your address and other related transaction details. This information is necessary for the adequate performance of the contract between you and MRL Payments and to allow the provision of the Payment Services.

#### 2.1.5 Information We Collect from Third Parties.

MRL and MRL Payments may collect information, including personal information, that others provide about you when they use the MRL Platform and the Payment Services, or obtain information from other sources and combine that with information we collect through the MRL Platform and the Payment Services. We do not control, supervise or respond for how the third parties providing your information process your Personal Information, and any information request regarding the disclosure of your personal information to us should be directed to such third parties.

- **Third Party Services.** If you link, connect, or login to your MRL Account with a third party service (e.g. Google, Facebook, WeChat), the third party service may send us information such as your registration, friends list, and profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- **Your References.** If someone has written a reference for you, it may be published on your MRL public profile page with your consent.
- **Background Information.** To the extent permitted by applicable laws, MRL and MRL Payments may obtain reports from public records of criminal convictions or sex offender registrations. Alternatively, MRL and MRL Payments may obtain the local version of police or regulators, background, criminal or registered sex offender checks. We may use your information, including your full name and date of birth, to obtain such reports.
- **Referrals.** If you are invited to MRL, the person who invited you may 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 (with your consent where required) or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the MRL Platform through partnerships, or about your experiences and interactions from our partner ad networks.

#### **2.2 Children’s Data.**

Our websites and applications are not directed to children or natural person under 18 and we do not knowingly collect any personal information directly from children or natural person under 18. If you

believe that we processing the personal information pertaining to a child inappropriately, we take this very seriously and urge you to contact us.

### **3. HOW WE USE INFORMATION WE COLLECT**

We may use, store, and process personal information to (1) provide, understand, improve, and develop the MRL Platform, (2) create and maintain a trusted and safer environment (such as to comply with our legal obligations and ensure compliance with MRL Policies) and (3) provide, personalize, measure, and improve our advertising and marketing.

**3.1 Provide, Improve, and Develop the MRL Platform.** We may use the personal information to provide, improve, and develop the MRL Platform such as to:

- enable you to access and use the MRL Platform,
- enable you to communicate with other Members,
- operate, protect, improve, and optimize the MRL Platform and experience, such as by performing analytics and conducting research,
- provide customer service,
- send you service or support messages, updates, security alerts, and account notifications,
- if you provide us with your contacts' information, we may process this information: (i) to facilitate your referral invitations, (ii) send your requests for references, (iii) for fraud detection and prevention, and (iv) for any purpose you authorize at the time of collection,
- to operate, protect, improve, and optimize the MRL Platform and experience, and personalize and customize your experience (such as making Listing suggestions, ranking search results), we conduct profiling based on your interactions with the MRL Platform, your search and booking history, your profile information and preferences, and other content you submit to the MRL Platform, and
- enable your use of our enterprise products, as the case may be.

We process this personal information for these purposes given our legitimate interest in improving the MRL Platform and our Members' experience with it, and where it is necessary for the adequate performance of the contract with you.

**3.2 Create and Maintain a Trusted and Safer Environment.** We may use the personal information to create and maintain a trusted and safer environment such as to:

- detect and prevent fraud, spam, abuse, security incidents, and other harmful activity,
- conduct security investigations and risk assessments,
- verify or authenticate information or identifications provided by you,
- conduct checks against databases and other information sources, including background or police / regulator checks, to the extent permitted by applicable laws and with (or without in case of such information source is available publicly) your consent where required,
- comply with our legal obligations,
- Resolve any disputes with any of our Members and enforce our agreements with third parties,
- enforce our Terms of Service and other policies, and
- in connection with the activities above, we may conduct profiling based on your interactions with the MRL Platform, your profile information and other content you submit to the MRL Platform, and information obtained from third parties. In limited cases, automated processes may restrict or suspend access to the MRL Platform if such processes detect activity that we think poses a safety or other risk to the MRL Platform, our community, or third parties. If you challenge the decisioning based on the automated process, please contact us.

We process this personal information for these purposes given our legitimate interest in protecting the MRL Platform, to measure the adequate performance of our contract with you, and to comply with applicable laws.

**3.3 Provide, Personalize, Measure, and Improve our Advertising and Marketing.** We may use the personal information to provide, personalize, measure, and improve our advertising and marketing such as to:

- send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences (including information about MRL or partner campaigns and services) and social media advertising through social media platforms such as Facebook or Google),
- personalize, measure, and improve our advertising,
- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by MRL or its third party partners,
- conduct profiling on your characteristics and preferences (based on the information you provide to us, your interactions with the MRL Platform, information obtained from third parties, and your search and booking history) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you,
- enrolling in an email subscription will not affect the frequency of administrative emails that we may send in connection with any MRL Account. No fee is charged for sending promotional emails to you, but third-party data rates may apply. Note that you may not be able to take advantage of certain promotions if you do not have an MRL Account, and
- invite you to events and relevant opportunities.

We will process your personal information for the purposes listed in this section given our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest.

**3.4 How the Payments Data Controller uses the Personal Information Collected.** We may use the personal information as a part of Payment services such as to:

- Enable you to access and use the Payment Services.
- Detect and prevent fraud, abuse, security incidents, and other harmful activity.
- Conduct security investigations and risk assessments.
- Conduct checks against databases and other information sources.
- 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.

The Payments Data 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.

### **3.5 SMS Terms**

For text messaging, by requesting, joining, agreeing to, enrolling in, signing up for, acknowledging, or otherwise consenting to receive one or more text messages ("Opting In") or using a MRL arrangement in which MRL sends (or indicates that it may send, or receives a request that it send) one or more text messages ("Text Message Service"), you accept these SMS Terms ("SMS Terms"), consent to the handling of your personal information as described in the MRL Privacy Policy, and agree to resolve disputes with MRL as described in our Terms of Service. Message and data rates may apply.

MRL will use reasonable commercial efforts to deliver the automated marketing text messages to the number you provide through compatible wireless carriers. Carriers and MRL are not liable for delayed or undelivered messages. The short code we use for some Text Message Services may not be supported on all carriers.

### Opting In

By Opting In to a Text Message Service:

- You expressly authorize MRL to use autodialer or non-autodialer technology to send text messages to the cell phone number associated with your Opt-In (i.e., the number listed on the Opt-In form or instructions, or, if none, the number from which you send the Opt-In, or, if none, the number on file for your account). You also authorize MRL to include marketing content in any such messages. You do not have to Opt In or agree to Opt In as a condition of purchase.
- You consent to the use of an electronic record to document your Opt-In. To withdraw that consent, request a free paper or email copy of the Opt-In, or to update our records with your contact information, please contact us. To view and retain an electronic copy of these SMS Terms or the rest of your Opt-In, you will need (i) a device (such as a computer or cell phone) with internet access, and (ii) either a printer or storage space on such device. If you withdraw your consent, certain features of our service may not be available to you. To update information on how we would contact you electronically, visit your Notification settings in your account settings.
- You confirm that you are the subscriber to the relevant phone number or that you are the customary user of that number on a family or business plan and that you are authorized to Opt In.
- You consent to the use of an electronic record to document your Opt-In. To withdraw that consent, update our records with your contact information, please contact us.
- These SMS Terms still will apply if you withdraw the consent mentioned above or opt out of the Text Message Service.

After Opting In, in addition to the main messages the service offers, you may receive one or more welcome messages or administrative messages, such as (in some cases) a request to confirm your Opt-In.

### About the Text Message Services and Opting Out

Message and data rates may apply. Unless otherwise noted, Text Message Services send multiple, recurring messages. MRL may terminate any Text Message Service or your participation in it at any time with or without notice, including, for example, before you have received any or all messages that you otherwise would have received, but these SMS Terms still will apply. Text STOP to any promotional message to Opt Out or if applicable, update your "Notification" settings on your MRL account, if any.

For additional help, text HELP in response to a marketing message or contact us.

### **3.6 Your Choices**

You have choices on the promotional messages that you choose to receive.

- You can limit the information you provide to MRL. Participation in promotions and marketing programs is voluntary.
- You can limit the communications that MRL sends to you.
  - To opt-out of marketing emails, simply inform us by replying any marketing email we send you or access the notification settings in your MRL Account, if applicable.
  - To revoke permissions that you may have given to send promotional text messages, text STOP in response to any message.

- Please note that even if you opt-out of marketing communications, we may still need to contact you with important transactional information about your account. For example, even if you opt-out of emails, we may still send you activity confirmations or fraud alerts.

## **4. SHARING & DISCLOSURE**

### **4.1 Advertising and Social Media; Sharing With Your Consent.**

Where you have provided consent, we share your information, including personal information, as described at the time of consent, such as when you authorize a third party application or website to access your MRL Account or when you participate in promotional activities conducted by MRL partners or third parties.

Where permissible according to applicable law we may use certain limited personal information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, to generate leads, drive traffic to our websites or otherwise promote our products and services on the MRL Platform. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest.

The social media platforms with which we may share your personal information are not controlled or supervised by MRL. Therefore, any questions regarding how your social media platform service provider processes your personal information should be directed to such provider.

Please note that you may, at any time ask MRL to cease processing your data for these direct marketing purposes by sending an e-mail to [cs@mroperation.com](mailto:cs@mroperation.com).

### **4.2 Sharing between Members.**

To help facilitate bookings or other interactions between Members, we may need to share certain information, including personal information, with other Members, as it is necessary for the adequate performance of the contract between you and us, as follows:

- When you as a Guest submit a booking request, certain information about you is shared with the Professionals (and Co-Professionals, if applicable), including your profile, full name, the full name of any additional Guests / Professionals, your cancellation history, and other information you agree to share. When your booking is confirmed, we will disclose additional information to assist with coordinating the trip, like your phone number.
- When you as a Professional (or Co-Professional, if applicable) have a confirmed booking, certain information is shared with the Guest / Professionals (and the additional Guests / Professional they may invite, if applicable) to coordinate the booking, such as your profile, full name, phone number, and address.
- When you as a Professional invite another Member to become a Co-Professional, you authorize the Co-Professional to access and update your information and Member Content, including but not limited to certain information like your full name, phone number, address, calendar, Listing information, Listing photos, and email address.
- When you as a Guest invite additional Guests to a booking, your full name, Professional name, Listing details, the address, and other related information will be shared with each additional Guest.
- When you as a Guest initiate a Group Payment Booking Request if any, certain information about each participant such as full name, profile picture as well as the booking details is shared among all participants of the Group Payment Booking Request, if any.

#### **4.3 Profiles, Listings, and other Public Information.**

The MRL Platform lets you publish information, including personal information, that is visible to the general public as the case may be. For example:

- Parts of your public profile page, such as your full name, your description, and city, are publicly visible to others.
- Listing pages are publicly visible and include information such as the services provided or needed, location (neighborhood and city) or precise location, Listing description, calendar availability, your public profile photo, aggregated demand information (like page views over a period of time), and any additional information you choose to share.
- After completing a booking, Guests and Professionals may write Reviews and rate each other. Reviews and Ratings may form a part of your public profile page and may also be surfaced elsewhere on the MRL Platform (such as the Listing page as the case may be).
- If you submit content in a community or discussion forum, blog or social media post, or use a similar feature on the MRL Platform, that content is publicly visible.

Based on our legitimate interest to promote the MRL Platform we may display parts of the MRL Platform (e.g., your Listing page) on sites operated by MRL's business partners, using technologies such as widgets or APIs. If your Listings are displayed on a partner's site, information from your public profile page may also be displayed.

Information you share publicly on the MRL Platform may be indexed through third party search engines. In some cases, if available, you may opt-out of this feature in your Account settings. If you change your settings or your public-facing content, these search engines may not update their databases. We do not control the practices of third party search engines, and they may use caches containing your outdated information.

#### **4.4 Additional Services by Professionals.**

Professionals may need to use third party services available through the MRL Platform to assist with managing their services or providing additional services requested by you. Professionals may use features on the MRL Platform to share information about the Guest (Guest name, Guest phone number) with such third party service providers for the purposes of coordinating and managing the services, or providing other services. Professional are responsible for third party service providers they use and ensuring those service providers process Guest information securely and in compliance with applicable law including data privacy and data protection laws.

#### **4.5 Compliance with Law, Responding to Legal Requests, Preventing Harm and Protection of our Rights.**

MRL and MRL Payments may disclose your information, including personal information, to courts, law enforcement, governmental authorities, tax authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or if such 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 MRL, (iii) to respond to a valid legal request relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability, (iv) to enforce and administer our Terms of Service, the Payment Terms or other agreements with Members, or (v) to protect the rights, property or personal safety of MRL, its employees, its Members, or members of the public. For example, if permitted due to the forgoing circumstances, Professionals tax information may be shared with tax authorities or other governmental agencies.

These disclosures may be necessary to comply with our legal obligations, for the protection of your or another person's vital interests or for the purposes of our or a third party's legitimate interest in keeping the MRL Platform secure, preventing harm or crime, enforcing or defending legal rights, facilitating the collection of taxes and prevention of tax fraud or preventing damage.

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 harm to an individual or group, or create or increase a risk of fraud upon MRL's property, its Members and the MRL Platform. In instances where we comply with legal requests without notice for these reasons, we may attempt to notify that Member about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

#### 4.6 Service Providers.

MRL and MRL Payments uses a variety of third-party service providers to help us provide services related to the MRL Platform and the Payment Services. Service providers may be located inside or outside of the European Economic Area ("EEA"). In particular, our service providers may be based in Europe, India, Asia Pacific and North and South America.

For example, service providers may 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 MRL 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 other similar claims if any. These providers have limited access to your personal information to perform these tasks on our behalf, and are contractually bound to protect the personal information and only use the personal information in accordance with our instructions .

MRL and the MRL Payments will need to share your information, including personal information, in order to ensure the adequate performance of our contract with you.

#### 4.7 Corporate Affiliates.

To enable or support us in providing the MRL Platform and the Payment Services, we may share your information, including personal information, within our corporate family of companies (both financial and non-financial entities) that are related by common ownership or control.

- Your information may be shared with MRL entities which provides the technical infrastructure for the MRL Platform, product development and maintenance, customer support, trust and safety and other business operation services to other MRL entities. The data sharing is necessary for the performance of the contract between you and us and is based on our legitimate interests in providing the MRL Platform globally.
- **Sharing with MRL Payments.** In order to facilitate payments on or through the MRL Platform, certain information as described above in "[Information that is necessary for the use of the Payment Services](#)" section above, may be shared with the relevant MRL Payments entities. The data sharing is necessary for the performance of the contract between you and us.
- Some of your information may be shared with MRL entities when you create a Listing or when you book a Professional Services. The information shared in these circumstances may include: (i) your name, e-mail address and phone number, (ii) information relating to the Listing or Professional Services, including its address, (iii) booking information for the Listing or Professional Service, including but not limited to booking dates and payment amounts, and (iv) the names, nationalities, and identification details (including certificates / passport / national ID numbers and expiry dates) of any Guests. Additionally, when you send a message to a Professional or Guest, your name, profile picture and message content sent via the MRL Platform will be shared with MRL entities. The data sharing is necessary for the performance of the contract between you and us.
- Some of your information will be shared with MRL entities in the following circumstances:
  - Creating a Listing. If you create a Listing: (i) your name, phone number, gender, birth date, email address, information relating to where you live and work details, (ii) information

- relating to the Listing (e.g., address, government notification numbers, permit details or other information), (iii) booking information relating to the Listing, such as Guest details as set out below in Professional Services, booking dates, and payment amounts, (vi) details (if any) of the payout method associated with the Listing, and (v) messages between you and prospective and confirmed Guests at the Listing.
- Professional Services. If you book a Professional Service: (i) your name, phone number, gender, birth date, email address, information relating to where you live and your work, IP address in relation to the transaction, (ii) booking dates, (iii) messages between the Professional and you or other Guests on the same booking, (iv) details (if any) of the payment method used by any Guests for booking the Professional Service, and (v) the names and identification detail (if available) of any Guests.
  - Sending Messages. If you send a message to a Professional in relation to our / Professional Services, your first name, profile picture and message content.

The data sharing is necessary for the performance of the contract between you and us to enable you to list or book Professional Services and communicate with Members.

Where required under law and you have expressly granted permission, MRL may disclose your information to the government agencies without further notice to you. We'll notify you in advance in the above situations, and in specific situations where we apply any practices that differ from what is described in this Privacy Policy (including practices pertaining to disclosures to government agencies).

Additionally, we share your information, including personal information, with our corporate affiliates in order to support and integrate, promote, and to improve the MRL Platform and our affiliates' services.

#### **4.8 Collection and Remittance of Taxes.**

In jurisdictions where MRL facilitates the Collection and Remittance of Taxes as described in the "Taxes" section of the Terms of Service, Professionals and Guests, where legally permissible according to applicable law, expressly grant us permission, without further notice, to disclose Professionals' and Guests' data and other information relating to them or to their transactions, bookings and Taxes to the relevant tax authority, including, but not limited to, the Professional's or Guest's name, Listing addresses, transaction dates and amounts, tax identification number(s), the amount of taxes received (or due) by Professionals from Guests, and contact information.

#### **4.9 Government Registration.**

In jurisdictions where MRL facilitates or requires a registration, notification, permit, or license application of a Professional with a local governmental authority through the MRL Platform in accordance with local law, we may share information of participating Professionals with the relevant authority, both during the application process and, if applicable, periodically thereafter, such as the Professional's full name and contact details, address, tax identification number, Listing details.

#### **4.10 Information Provided to Enterprise Customers.**

If you have linked your MRL Account to the MRL Account of a company or other organization (an "Enterprise"), added your work email address, or have a booking facilitated via another party (such as the future employer or other entity) or used a coupon in a similar capacity in connection with an Enterprise (such as using a coupon to pay for a service for an enterprise related event), that Enterprise will have access to your name, contact details, permissions and roles, and other information as required to enable use by you and the Enterprise.

#### **4.11 Professional Information Provided to MRL for Work Customers.**

If a booking is designated as being for business purposes and made by a Guest affiliated with an Enterprise, and the Enterprise is enrolled in our MRL for Work , such as a booking made for business purposes using a coupon provided by an Enterprise, we may disclose information related to the booking to the Enterprise, such as the name, the address, booking dates, pricing, Listing details, and other related information, to the extent necessary for the adequate performance of MRL's contract with the Enterprise and to provide the services. . At the request of the Enterprise or the Guest, we may also share this information with third parties engaged by the Enterprise.

#### **4.12 Guest Information Provided to MRL for Work Customers.**

If you have linked your MRL Account with an Enterprise, and you are included on a booking designated as being for business purposes, we may disclose information related to the booking to the Enterprise to the extent necessary for the adequate performance of MRL's contract with the Enterprise. Typically, this includes information related to the booking, such as name, dates of the booking, pricing, Listing details, the address, and other related information. At the request of you or your Enterprise, we may also disclose this information to service providers engaged by it. In the event of a dispute, emergency, or similar situation involving a booking identified as being for business purposes, MRL may also share additional relevant information it believes is necessary to safely and quickly address the situation.

#### **4.13 Programs with Members.**

We may share personal information and booking information with Members in order to facilitate programs. Booking and personal information may be shared with Members, or planned community where a Member located at and/or the listing is to facilitate Professional Services, security, billing, and other services that may be provided.

#### **4.14 Business Transfers.**

If MRL undertakes or is involved in any merger, acquisition, reorganization (not including change of shares ownership), 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.

#### **4.15 Aggregated Data.**

We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, research, demographic profiling, marketing and advertising, and other business purposes.

## **5. OTHER IMPORTANT INFORMATION**

### **5.1 Analyzing your Communications.**

We may review, scan, or analyze your communications on the MRL Platform for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, analytics, 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 websites. 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. However, occasionally we may need to manually review some 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.

These activities are carried out based on MRL'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.

## **5.2 Linking Third Party Accounts.**

You may link your MRL Account with your account at a third party social networking service. Your contacts on these third party services are referred to as "Friends." When you create this link:

- some of the information you provide to us from the linking of your accounts may be published on your MRL Account profile;
- your activities on the MRL Platform may be displayed to your Friends on the MRL Platform and/or that third party site;
- a link to your public profile on that third party social networking service may be included in your MRL public profile;
- other MRL users may be able to see any common Friends that you may have with them, or that you are a Friend of their Friend if applicable;
- other MRL 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;
- the 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
- the publication and display of information that you provide to MRL through this linkage is subject to your settings and authorizations on the MRL Platform and the third party site.

We only collect your information from linked third party accounts 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.

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

The MRL Platform may contain links to third party websites or services, such as third party integrations, co-branded services, or third party-branded services ("Third Party Partners"). MRL doesn't own or control these Third Party Partners and when you interact with them, you may be providing information directly to the Third Party Partner, MRL, or both. These Third Party Partners will have their own rules about the collection, use, and disclosure of information. We encourage you to review the privacy policies of the other websites you visit.

Parts of the MRL Platform may use third party services such as Google Maps/Earth services, including the Google Maps API(s), and MRL Payments. Use of these respective services is subject to their privacy policies such as Google Maps/Earth Additional Terms of Use, and the Google Privacy Policy.

## **6. YOUR RIGHTS**

Consistent with applicable law, you may email to us ([cs@mroperation.com](mailto:cs@mroperation.com)) exercise any of the rights described in this section before your applicable MRL Data Controller and Payments Data Controller. Please note that we may ask you to verify your identity and request before taking further action on your request.

### **6.1 Managing Your Information.**

You may access and update some of your information through your Account settings where applicable. If you have chosen to connect your MRL Account to a third-party application, like Facebook / Google / LinkedIn, you can change your settings and remove permission for the app by changing your Account settings / if applicable send us emails ([cs@mroperation.com](mailto:cs@mroperation.com)). You are responsible for keeping your personal information up-to-date.

### **6.2 Rectification of Inaccurate or Incomplete Information.**

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

### **6.3 Data Access and Portability.**

In some jurisdictions, applicable law may entitle you to request certain copies of your personal information held by us. You may also be entitled 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).

### **6.4 Data Retention and Erasure.**

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. In certain jurisdictions, you can request to have all your personal information deleted entirely." Please note that if you request the erasure of your personal information:

- We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if we suspend an MRL Account for fraud or safety reasons, we may retain certain information from that MRL Account to prevent that Member from opening a new MRL Account in the future.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, MRL and MRL Payments may keep some of your information for tax, legal reporting and auditing obligations.
- Information you have shared with others (e.g., Reviews, forum postings) may continue to be publicly visible on the MRL Platform, even after your MRL Account is cancelled. Additionally, some copies of your information (e.g., log records) may remain in our database, but are disassociated from personal identifiers.
- Because we maintain the MRL Platform 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.

### **6.5 Withdrawing Consent and Restriction of Processing.**

If we are processing your personal information based on your consent you may withdraw your consent at any time by changing your Account settings or by sending a communication to MRL 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. Additionally, in some jurisdictions, applicable law may give you 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 information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing pursuant to Section 6.6 and pending the verification whether the legitimate grounds of MRL override your own.

### **6.6 Objection to Processing.**

In some jurisdictions, applicable law may entitle you to require MRL and MRL Payments not to process your personal information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing MRL and/or MRL Payments 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 defence of legal claims.

Where your personal information is processed for direct marketing purposes, you may, at any time ask MRL to cease processing your data for these direct marketing purposes by sending an e-mail to [cs@mroperation.com](mailto:cs@mroperation.com).

### **6.7 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 [cs@mroperation.com](mailto:cs@mroperation.com).

## **7. OPERATING GLOBALLY & INTERNATIONAL TRANSFERS**

To facilitate our global operations MRL and MRL 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. For example, information collected within the EEA may be transferred, stored, and processed outside of the EEA for the purposes described in this Privacy Policy. Where we transfer store, and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

### **7.1 EU-US & Swiss-US Privacy Shield.**

MRL and MRL Payments comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, United Kingdom and Switzerland to the United States, respectively.

### **7.2 Other Means to Ensure an Adequate Level of Data Protection.**

If your information is shared with corporate affiliates or third party service providers outside the EEA, we have (prior to sharing your information with such corporate affiliate or third party service provider) established the necessary means to ensure an adequate level of data protection. This may be an adequacy decision of the European Commission confirming an adequate level of data protection in the respective non-EEA country or an agreement on the basis of the EU Model Clauses (a set of clauses issued by the European Commission).

### **7.3 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 their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those third parties. MRL and MRL Payments 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. 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. 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 requester'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 our Service and share personal information with third parties for the business purposes described in this Privacy Policy, including without limitation advertising and marketing on our Service and elsewhere based on users' online activities over time and across different sites, services, and devices.

## **8. 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. Some of the safeguards we use to protect your information are firewalls and data encryption, and information access controls. If you know or have reason to believe that your MRL Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your MRL Account, please contact us.

## **9. CHANGES TO THIS PRIVACY POLICY**

MRL reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the MRL Platform and update the "Last Updated" date at the top of this Privacy Policy. We will also provide you with notice of the modification by email at least fourteen (14) days before the date they become effective. If you disagree with the revised Privacy Policy, you may cancel your Account by contact us [cs@mroperation.com](mailto:cs@mroperation.com). If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of the MRL Platform will be subject to the revised Privacy Policy.

## **10. CONTACT US**

If you have any questions or complaints about this Privacy Policy or MRL's information handling practices, you may email us at the email addresses provided in the relevant sections above or contact us via mail at our registered office on MRL Platform.