

ROYALL STAYS **PRIVACY POLICY**

Last updated September 24, 2024

This [privacy policy](#) (“**Privacy Policy**”) describes how and why ROYALL STAYS, LLC and its subsidiaries and affiliated companies and/or brands (collectively, “**Company**,” “**we**,” “**us**,” or “**our**”) that might collect, store, use, and/or share (“**process**”) your information when you use our services, including without limitation when you visit <https://royallstays.com> (the “**Website**”) and/or applications available at the Website, and/or engage with us in other related ways (collectively, the “**Services**”).

BY USING THE SERVICES, YOU AGREE YOU (1) HAVE READ OUR [TERMS OF USE](#) AND THIS [PRIVACY POLICY](#) IN THEIR ENTIRETY; AND (2) UNDERSTAND, AND FULLY ACCEPT OUR [TERMS OF USE](#) AND THIS [PRIVACY POLICY](#) (COLLECTIVELY, THE “TERMS**”). IF YOU DO NOT AGREE TO BE BOUND BY THE TERMS, YOU ARE NOT AUTHORIZED TO ACCESS OR USE OUR SERVICES AND MUST PROMPTLY DISCONTINUE USING AND EXIT THE SERVICES.**

Reading this [Privacy Policy](#) will help you understand your privacy rights and choices. If you do not agree with either the Terms or our policies and practices, you must discontinue using and exit the Services promptly.

1. WHAT INFORMATION DO WE COLLECT?

We collect personal information that you voluntarily provide to us or is collected automatically when you express an interest in obtaining information about us or our products and Services, when you visit or otherwise participate in activities on the Services, or when you contact us.

Personally Identifiable Information (“PII”) you disclose to us.

The personally identifiable information (“**PII**”), which may specifically identify an individual or business, that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names;
- phone numbers;
- email addresses;
- mailing addresses;
- contact preferences;
- address of the Accommodation(s)
- social media profiles (if you choose to connect to WiFi while using the Accommodations via social login);
- device information
- WiFi usage data
- contact or authentication data; and/or
- any other identifiers which you may be prompted to provide in connection with accessing or using the Website and/or Services.

Non-Personally Identifying Information (“Non-PII”) automatically collected.

We automatically collect certain information when you visit, use, or navigate the Services. This non-personally identifying information (“**Non-PII**”) does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and

device characteristics and history, operating system, language preferences, referring URLs, device name, country, geolocation, behavioral consumer profile, information about how and when you use our Services, time spent on the Website and third party sites, pages visited, links clicked, payment methods used, the pages that led you to our Services, and other technical information. This information is primarily used to maintain the security and operation of our Services, for our internal analytics and reporting purposes, and for assisting us in providing you with target marketing and promotional content, including, without limitation, related to your Accommodation.

The information we collect includes:

- **log and usage data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
- **device data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- **location data.** We collect geolocation data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.
- **push notifications.** We may request to send you push notifications regarding your certain features of the Services. If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.
- **payment information.** In most events, your payment for an Accommodation is processed by a third-party payment provider (Stripe, Inc., <https://stripe.com>). You agree to abide by and be subject to the terms, conditions, and privacy policies of any and all third-party providers selected, in our sole discretion, with may change from time to time, in furtherance of providing the Services. We are not responsible for content on any third-party provider's platform or on any other site outside of the Website. In limited events, we may collect payment data to process certain payments, such as your credit card number; however, we do not store any payment data.

2. DO WE USE COOKIES OR OTHER TRACKING TECHNOLOGIES?

Like many businesses, we also collect information through cookies and similar technologies. We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

"Cookies" (or browser cookies), which are small files placed on the hard drive of your computer by the Website and/or Services to deliver content specific to your interest, save passwords, and for other purposes. When users visit the Website, a few lines of code will drop an anonymous browser cookie. The cookie will store the site visit, but does not store any sensitive information, such as visitor name, address or any other

piece of information that might personally identify the visitor. The cookie will be enabled for a set period of time, such as 60 or 90 days, at which time, the cookie expires. If you choose not to accept the cookie, certain areas and features of the Website and/or Services may be partially or wholly restricted.

“*Web beacons*” (or clear gifs, pixel tags or web bugs), which are tiny graphics with a unique identifier, similar in function to cookies, are placed in the code of a webpage. Web beacons monitor the traffic patterns of users from one page within our sites to another, deliver or communicate with cookies, understand whether you have come to the Website from an online advertisement displayed on a third-party website, and improve Website and/or Services performance.

Some content, including advertisements, on the Website and/or Services are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies, web beacons or other tracking technologies to collect information about you when you use the Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based advertising or other targeted content. We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

3. HOW DO WE PROCESS YOUR INFORMATION?

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **to deliver and facilitate delivery of the Services.** We may process your personal information to provide you with the Services.
- **to process your booking.** We may process your personal information, including, without limitation, sharing your personal information with the Host (as it is defined in our [Terms of Use](#)), to facilitate your booking for an Accommodation (as it is defined in our [Terms of Use](#)), and enable communications between you and the Host, as well as to facilitate other transactions you initiate with us.
- **to respond to user inquiries/offer support.** We may process your personal information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **to send administrative information.** We may process your personal information to send you details about our products and services, changes to our Terms and policies, and other similar information.
- **to enable user-to-user communications.** We may process your personal information if you choose to use any of our offerings that allow for communication with another user.
- **to request feedback.** We may process your personal information when necessary to request feedback and to contact you about your use of our Services.
- **to send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time by emailing us at optout@royallstays.com. For more information, see “**WHAT ARE YOUR PRIVACY RIGHTS?**” below.
- **to deliver targeted advertising.** We may process your personal information to develop and display personalized content and advertising tailored to your interests, location, and more.

- **to post testimonials.** We may post your User Content (as it is defined in our [Terms of Use](#)), including but not limited to, testimonials on our Services or third-party websites relating to the Accommodations, that may contain personal information.
- **to evaluate and improve our Services, products, marketing, and your experience.** We may process your personal information when we believe it is necessary to identify usage trends, determine the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, Accommodations, and your experience.
- **to determine the effectiveness of our marketing and promotional campaigns.** We may process your personal information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **to provide and manage WiFi services throughout your Accommodation(s):** We may process your PII in accordance with this [Privacy Policy](#) throughout your Accommodation(s) to offer and manage WiFi services, using StayFi (<https://stayfi.com>) or any other similar third-party provider, including guest authentication, network access, and related marketing activities.
- **to comply with our legal obligations and rights.** We may process your personal information to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.
- **to fulfil other purposes.** We may process your personal information to fulfil any other purpose as otherwise described to you at the point of collection.

If you are located in Canada, this section applies to you: We may process your information if you have given us specific permission (*i.e.*, express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (*i.e.*, implied consent). You can withdraw your consent at any time. In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be timely obtained.
- For investigations and fraud detection and prevention.
- For business transactions provided certain conditions are met.
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim.
- For identifying injured, ill, or deceased persons and communicating with next of kin.
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse.
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province.
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records.
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced.
- If the collection is solely for journalistic, artistic, or literary purposes.
- If the information is publicly available and is specified by the regulations.

4. **WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents (“**third parties**”) who perform services for us or on our behalf and require access to such information to do that work. The categories of third parties we may share personal information with are as follows:

- payment processors;
- ad networks;
- communication & collaboration tools;
- sales, marketing, and trend analysis tools;
- property management software;
- pricing tools;
- testing tools;
- Website hosting service providers;
- data analytics services;
- data storage service providers;
- social networks; and
- retargeting platforms.

We also may need to share your personal information with third parties in the following situations:

- **Hosts.** We share your personal information with the Host once you book your Accommodation to facilitate your Accommodation experience and to enable communications between you and the Host.
- **processing payment.** We may share your personal information to facilitate payment of a booking and/or other transactions you initiate with us through a third-party service provider, such as Stripe or Stripe affiliated entities.
- **business transfers.** We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **affiliates.** We may share your information with our affiliates, if any, in which case we will require those affiliates to honor this [Privacy Policy](#). Affiliates may include a parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **business partners.** We may share your information with our business partners to offer you certain products, services, or promotions.
- **legal obligations.** We may disclose information you provide, including your PII, if required to do so by law or if we believe, in our sole discretion, that disclosure is reasonably necessary to: (a) comply with federal, state, or local law, requests or orders from law enforcement, or any legal process (whether or not such disclosure is required by applicable law); (b) protect or defend us or a third party’s rights or property; (c) protect someone’s health or safety, such as when harm or violence against any person (including you) is threatened; and/or (d) prevent fraud.
- **aggregate information.** We may share aggregate information that does not include PII, and we may otherwise disclose Non-PII with third parties for industry analysis, demographic profiling, and other purposes. Any aggregate information shared in these contexts will not contain your PII.
- **Google Ads.** We also use Google Ads tracking technology to analyze website traffic and improve our advertising efforts. Google Ads uses cookies and similar technologies to collect information about your interactions with our Website, including but not limited to IP addresses, browser types,

pages visited, and time spent on pages. This data helps us understand user engagement and optimize our advertising strategies. The data we collect may be shared with third-party processors, like Google Ads, to aid in the analysis of website traffic and the enhancement of our advertising initiatives. For more information on how Google Ads collects and processes data, please visit Google's Privacy & Terms. You have the right to access, correct, delete, or limit the use of your personal data, as well as to opt-out of data collection and targeted advertising by adjusting your browser settings or utilizing opt-out tools provided by Google Ads.

- **WiFi Providers.** We utilize StayFi, a guest WiFi and marketing platform, to enhance services provided by your Host throughout your Accommodation(s). When you connect to the WiFi network powered by StayFi, we may collect additional information including your email address, name, phone number, social media profile (if you choose to connect via social login), device information, and your WiFi usage data. The data we collect is used to improve your stay experience, provide personalized services, and for marketing purposes.

5. THIRD PARTY WEBSITES

THE WEBSITE AND/OR SERVICES MAY CONTAIN LINKS TO THIRD PARTY OWNED AND/OR OPERATED WEBSITES. **WE ARE NOT RESPONSIBLE FOR THE PRIVACY PRACTICES OR THE CONTENT OF ANY THIRD PARTY WEBSITE.** We suggest that you contact these third parties directly for information regarding their privacy, security, and data collection and distribution policies prior to providing them with any information.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

When we no longer have a legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk.

The safety and security of your information also depends on you. While currently the Services do not require a password, in the event we have given you (or where you have chosen) a password for access to certain parts of our Website and/or Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Services like message boards. The information you share in public areas may be viewed by any user of the Website and/or Services.

WiFi services provided throughout your Accommodation(s) are powered by StayFi and employ industry-standard security measures to protect your information. However, by agreeing to this [Privacy Policy](#), you acknowledge that you are aware that public WiFi networks may have inherent security risks, and you agree to use caution when transmitting sensitive information over these networks.

All PII that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

8. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under eighteen (18) years of age. By using the Services, you represent that you are at least eighteen (18) years old or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than eighteen (18) years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from anyone under the age of eighteen (18), please contact us at info@royallstays.com with "*Minor Data Collected Notification*" in the subject line.

9. WHAT ARE YOUR PRIVACY RIGHTS?

The types of personal data we collect are listed in "**WHAT INFORMATION DO WE COLLECT**" above. If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "**HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**" below. Please refer to our contact information below. However, please note that this will not affect the lawfulness of the processing of your personal information before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section "**HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**" below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

You have the right to request information about the data collected through our WiFi services powered by StayFi. You may also request to delete this data or opt-out of certain data collection practices related to our WiFi services. If you do not want us to share your information with nonaffiliated or non-agent third parties for promotional purposes, contact us using the details provided in the section "**HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**" below.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or portions of our Services. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. Most web browsers maintain a "help" section on the toolbar that provides more information about cookies. Please refer to this "help" section for information on how to receive notifications when you are receiving a new cookie and how to turn cookies off.

10. YOUR STATE PRIVACY RIGHTS

Residents of certain states, such as California, Maryland, Montana, Nevada, and Texas, may have additional personal information rights and choices. Please visit our [State-Specific Privacy Policy](#) for more information about your state privacy rights. If you have questions or comments about your privacy rights, you may email us at info@royallstays.com.

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("**DNT**") feature or setting you can activate to signal your privacy preference not to have data about your

online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this [Privacy Policy](#).

12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Under applicable law, you or someone legally authorized to act on your behalf (your “**authorized agent**”), may make a request to access, correct or delete your PII. You may, under applicable law, also make a request to know or delete PII on behalf of your child (however, please note, we do not knowingly collect any PII of anyone under the age of eighteen (18)). Requests or exercise of your right(s) can be made by:

- emailing us at info@royallstays.com with “*My PII Rights*” in the subject line.
- calling us at (843) 936-1555
- sending us a written request by mail to:

Royall Stays LLC
58 Shem Drive
Mount Pleasant, SC 29464

A request or exercise of your right(s) must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized agent, and should include: (i) the state of which you are a resident; (ii) a description of your request/exercise of your right, with sufficient detail that allows us to properly understand, evaluate, and respond; and (iii) identifying personal information.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm your information.

We will only use your information provided in the request to verify the requestor’s identity or authority to make said request. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

13. GOVERNING LAW

We control and operate the Website and provide the Services from the United States. The Services is not intended to subject us to the laws or jurisdiction of any state, country, or territory other than that of the United States. We do not represent or warrant that the Services is appropriate for use in any particular jurisdiction. Those who choose to access the Services do so at their own initiative and are responsible for complying with all applicable international, federal, state, and local laws, rules, and regulations.

14. INTERNATIONAL USERS

This section is applicable only to users who access, use, or interact with the Services in countries outside the United States, including without limitation the European Economic Area (“**EEA**”), and supplements certain sections of this [Privacy Policy](#) and provides additional information that should be read together with all other sections of this [Privacy Policy](#). To the extent there is any conflict between this section and the other sections of the [Privacy Policy](#), this section shall govern.

The laws of some jurisdictions, such as the European Union, require companies to tell you about the legal basis for using, sharing, or disclosing your information. To the extent those laws apply, we may rely on the following legal bases:

- **performance of a contract:** where use of your information is necessary to provide you with the Services under a contract, for example the [Terms of Use](#).
- **legitimate interest:** where use of your information is necessary for our or others' legitimate interests and where the use is not outweighed by your rights and interests. Below are some examples of such interests:
 - providing the Services;
 - improving the Services and developing new ones;
 - recognizing and better understanding our users, including across platforms;
 - conducting security and fraud prevention activities;
 - marketing and promoting our content and services;
 - building and managing business relationships;
 - conducting compliance and risk management activities; and
 - providing and managing access to our systems
- **legal obligation:** where use of your information is necessary to comply with laws and regulations such as those relating to anti-bribery and corruption and anti-money-laundering, complying with requests from government bodies or courts, or responding to litigation.
- **with consent:** we may ask for your consent to process your information in a certain way. Where we rely on this basis, you have the right to withdraw your consent at any time – please see “**WHAT ARE YOUR PRIVACY RIGHTS?**” section above to do this.

15. DO WE MAKE UPDATES TO THIS NOTICE?

We may update this [Privacy Policy](#) from time to time. The updated version will be indicated by an updated “last updated” date and the updated version will be effective as soon as it is accessible. If we make material changes to this [Privacy Policy](#), we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this [Privacy Policy](#) frequently to be informed of how we are protecting your information.

16. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

We welcome your comments and questions regarding our privacy policies. If you have any questions about this [Privacy Policy](#), please contact us at:

Royall Stays LLC
58 Shem Drive
Mount Pleasant, SC 29464
info@royallstays.com
(843) 936-1555