

ZHC Privacy Policy

Last Updated: 2/2/2023

Zealandia Holding Company and its subsidiaries (“we,” “us,” or “our,”) respect the privacy of our users (“you” or “your”). This privacy policy (“Privacy Policy”) governs how we and our affiliates, subsidiaries, and related entities operate. We have developed this privacy policy that describes our practices concerning the collection, use, disclosure, transfer, and storage of your personal information. Our website may contain links to third-party websites. This Privacy Policy will not apply to any information you may provide while on such third-party websites and we recommend you review and become familiar with their privacy policies as well.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual. In particular, we have collected, disclosed, and sold the following categories of personal information:

Category	Example(s)	Source(s)	Purpose of Collection
Identifiers	Name, email address, physical address, phone number, driver’s license number, passport number, social security number, etc.	Directly from the individual	Maintaining and servicing your account, providing customer service, processing transactions, providing you with marketing communications, managing your email preferences, providing updates on your reservations or properties, responding to inquiries
Customer records	Name, signature, credit card number, bank account number, other financial information, etc.	Directly from the individual	Maintaining and servicing your account, providing customer service, processing transactions, managing incident responses
Commercial Information	Purchase/reservation history	Directly from the consumer	Maintaining and servicing your account, providing customer service, processing transactions, providing you with marketing communications
Protected Classification	Gender	Directly from the consumer	Maintaining and servicing your account
Internet/ Network Activity	Information regarding your interaction with our websites, IP address, web session data	Directly from the consumer, indirectly from service providers	Providing advertising or marketing services, providing analytic services

Geolocation Data	IP address	Directly from the consumer, indirectly from service providers	Providing advertising or marketing services, providing analytic services
Audio, electronic, visual, etc. information	Video recordings, audio recordings	Directly from the consumer, indirectly from service providers	Providing customer service, monitoring the security of our properties

What About Cookies?

To enable our systems to recognize your browser or device and to provide our services to you, we use cookies and pixels. A “cookie” is a small text file that a website can place on your web browser to, for example, collect information about your activities on the site to maintain your online reservation and to keep your account secure. Cookies also help us to enhance your experience when using our website to help us understand how to better serve our website users.

We use both first and third-party cookies on our website. First-party cookies are those sent by us, whereas third-party cookies are sent from a domain different from the domain of the website you are visiting for our advertising and marketing efforts. Really, we use cookies to:

- Assist with your navigation of our website;
- Track the number of visitors on our site;
- Remember your site preferences (e.g., account logins);

Disclosure of Personal Information

We have disclosed the following categories of personal information to our service providers for the business purpose of performing services on our behalf such as maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services on our behalf.

- Identifiers;
- Customer Records;
- Commercial Information;
- Protected Classifications;
- Internet/Network Activity;
- Geolocation Data; and
- Audio, electronic, visual, information.

We may also disclose personal information for the following purposes:

- **Fraud Prevention:** We may disclose your personal information when we believe disclosure is necessary to investigate, prevent, or respond to suspected illegal or fraudulent activity or to protect the safety, rights, or property of us, our users, or others.
- **Law enforcement or legal requests:** We may disclose your personal information with government authorities, such as law enforcement authorities, courts, or regulators to comply with the law.

- **Corporate Restructuring:** We may transfer your information to a third party if we or any of our affiliates are involved in a corporate restructuring, including a sale, merger, or other transfer of some or all of our assets.

Notice to Individuals in California

Under the California Consumer Privacy Act (CCPA), California consumers are provided with certain privacy rights which they may exercise themselves or through an authorized agent.

The Right to Opt-Out of the Sale or Sharing of Personal Information: Under the CCPA, the term “sale” and “share” encompasses some of our tracking, analytics, and advertising activities occurring with third parties via cookies and trackers on our website. Therefore, we may sell or share the following categories of personal information as defined by the CCPA to our cookie and tracker providers:

- Internet/Network activity; and
- Geolocation data.

We do not knowingly sell personal information of California consumers under the age of sixteen (16) years.

If you would like to opt out of the sale or sharing of your personal information through these cookies, please click on the “Do Not Sell or Share My Personal Information” link located in the footer of the website in which you viewed this Privacy Policy to update your cookie preferences.

The Right to Know: You have the right to request that we disclose to you the personal information we have collected, used, disclosed, or sold about you in the previous twelve (12) months. You may also request a copy of the personal information we have collected on you over the past twelve (12) months.

The Right to Deletion: You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete and direct our service providers to delete your personal information from our records, unless an exception applies.

The Right to Correct: You have the right to request that Zealandia correct any inaccurate personal information that we have collected from you and maintain. Once we have received the personal information from you to be updated, we will update the information where necessary within our systems.

Please see the “Exercising Your Privacy Rights” section below for details on how to submit a right to access, right to deletion, and/or right to correction request.

Use of an Authorized Agent

You may designate, in writing or through a power of attorney, an authorized agent to make these privacy requests on your behalf to exercise your rights under the CCPA, however we may require them to verify their own identity.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;

- Charge you different prices or rates for goods or services, including granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods and services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Notice to Individuals in Virginia

Under the Virginia Consumer Data Protection Act (VCDPA), Virginia residents are provided with certain privacy rights which they may exercise.

The Right to Opt-Out: You have the right to opt-out of the processing of your personal data for the purposes of targeted advertising. If you would like to opt out of targeted advertising, please click on the “Do Not Sell or Share My Personal Information” link located in the footer of the website in which you viewed this Privacy Policy to update your cookie preferences. Please note, we do not sell your personal data as defined by the VCDPA.

The Right to Know: You have the right to confirm whether or not Zealandia is processing your personal data and to access such personal data.

The Right to Data Portability: You have the right to obtain a copy of your personal data that you previously provided to Zealandia in a portable, and to the extent technically feasible, readily usable format that allow you to transmit data to another controller without hindrance, where the processing is carried out by automated means.

The Right to Correct: You have the right to request that Zealandia correct any inaccurate personal information that we have collected from you and maintain. Once we have received the personal information from you to be updated, we will update the information where necessary within our systems.

The Right to Delete: You have the right to request that we delete any of your personal information that we collected from you and retained. Once we receive and confirm your verifiable request, we will delete and direct our service providers to delete your personal information from our records.

Please see the “Exercising Your Privacy Rights” section below for details on how to submit a right to know, right to data portability, right to deletion, and/or right to correction request.

Notice to Individuals in the European Union and United Kingdom

Lawful Basis of Processing

We will only collect and process personal data from individuals accessing the website in the European Union and United Kingdom where we have a lawful basis to do so. We rely on the following lawful bases to process your personal data:

- With your consent;
- For the fulfilment of a contract you have entered into with us;
- For compliance with a legal obligation to which we are subject;
- When the processing is necessary for the purposes of the legitimate interests pursued by our organization

Where we need to collect personal data from you in order to fulfill our contract with you, and you do not provide the data, we will not be able to enter into the contract.

Your Data Subject Access Rights

European Union and United Kingdom data subjects have the following rights, subject to certain exemptions, with respect to the personal information we hold:

1. The right to request access to the personal data we hold;
2. The right to request rectification of any inaccurate or incomplete personal data;
3. The right to request the deletion or erasure of the personal data;
4. The right to request that we restrict our processing of your personal data;
5. The right to object to the processing of your personal data; and
6. The right to request that your data be ported to another controller.

Additionally, when our processing is based on your consent, you may withdraw this consent at any time.

Please see the “Exercising Your Privacy Rights” section below for details on how to submit one of these requests. If you are not satisfied with our answers to your questions, you also have the right to file a complaint with your supervisory authority.

Exercising Your Privacy Rights

If you are a resident of California or Virginia or are currently located in the European Union or United Kingdom and would like to exercise your rights outlined above, please contact us through either of the following options. We may require you to provide certain personal information to allow us to verify your identity, such as your email address, phone number, confirmation number, owner ID number, etc. If we cannot comply with a request, we will explain the reasons in our response.

Calling us at **855-822-3996**

Emailing us at privacy@zhcompany.com

Security of Personal Information

We take the security of your personal information seriously. To protect the privacy and security of your personal information, we maintain physical, technical, and administrative safeguards. We update and test our security technology on an ongoing basis. Additionally, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

How Long do we Keep your Personal Information?

We keep your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, as may be required by law (e.g., for tax and accounting purposes), or as otherwise communicated to you. This is based on the nature of the data, why the data was collected and processed, and additional applicable legal retention requirements.

Changes to Our Privacy Notice

We reserve the right to amend the Privacy Policy at any time and for any reason, without notice to you, other than the posting of the amended Privacy Policy. Users should check our site to see the current Privacy Policy that is in effect and any changes that may have been made to it. The provisions contained

herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions that govern them.

Questions

If you have questions regarding our Privacy Policy or your privacy rights as described above, please contact us at:

Zealandia Holding Company
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privacy@zhcompany.com