



Privacy Policy

Questions about our terms? Contact Us info@aldea.travel

Last Updated: September 10, 2022

ALDEA Travel is an Impact peer-to-peer travel marketplace based in LATAM. It seeks to connect travellers with genuine, authentic, high-quality hosts and experiences in Latin America while fostering fair trade and donating directly to NGOs to foster sustainable development.

Our mission is to create a world where you can travel and catalyse a positive impact. We connect travellers with locals that provide experiential and immersive travel experiences fostering fair trade and directly impacting development projects at the destination.

From tours to expeditions to cooking classes, browse through curated listings to find the ones that fit the way you travel. Delivering growth & prosperity that benefits everyone. It is a fundamental part of what we do to be able to trust each other and this means being clear about how we use your information and protecting your human right to privacy.

This Privacy Policy describes how ALDEA Travel, LTD. and its affiliates (“we,” “us,” or “ALDEA Travel”) use your personal information in connection with the ALDEA Travel Platform.

1. DEFINITIONS

Undefined terms in this Privacy Policy have the same definition as in our [Terms of Service](#) (“Terms”).

2. PERSONAL INFORMATION WE COLLECT

2.1 Information needed to use the ALDEA Travel Platform.

Through the ALDEA Travel Platform, we collect personal information about you. It may not be possible for us to provide all services requested without it. Among this information are:

- **Contact Information, Account, Profile Information.** Such as your first name, last name, phone number, postal address, email address, date of birth, and profile photo, some of which will depend on the features you use.



- **Identity Verification and Payment Information.** Your government issued ID (as permitted by applicable laws), your ID number or other identification information, and your bank account or payment account information. If you are not an ALDEA Travel user, we may receive payment information relating to you, such as when an ALDEA Travel user provides your payment card to complete a booking. If a copy of your ID is provided to us, we may scan, use, and store information contained in your ID to verify your identity.

2.2 Information you choose to give us.

You can choose to provide us with additional personal information. This information may include:

- **Profile information.** Personal description, preferred language(s), and city. As indicated in your account settings, some of this information will be visible on your public profile page.
- **Information About Others.** You may have access to another person's payment instrument or information regarding a co-traveler. You certify that, by providing ALDEA Travel with personal information about others, you have the permission to share that information with ALDEA Travel for the purposes outlined in this Privacy Policy, and that they have read and understood the ALDEA Travel Privacy Policy.
- **Address Information.** Address you import or enter manually.
- **Other Information.** For example, when you fill out a form, add information to your account, respond to surveys, post to community forums, participate in promotions, communicate with our customer service team and other Members, or share your experience with us. Depending on your choice, this may include health information.

2.3 Automatically collected information through ALDEA Travel Platform and Payment Services.

When you use the ALDEA Travel Platform and Payment Services, we automatically collect personal information. This information may include:

- **Geo-location Information.** According to your device settings, your IP address or mobile device's GPS can determine your precise or approximate location. Your settings or



device permissions may also allow us to collect this information when you aren't using the app.

- **Information about usage.** ALDEA Travel Platform records the pages or content you view, searches you conduct for Listings, bookings you make, and other actions that you take.
- **Payment Transaction Information.** Details on the payment instrument used, the date and time of the payment, the amount of the payment, the expiration date and billing address of the payment instrument, PayPal's email address, your IBAN information, and your address are included in the details of the transaction.
- **Information about logs and devices.** It includes information about how you have used ALDEA Travel Platform (including clicking on third-party links), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and pages you have viewed or engaged with before or after using ALDEA Travel Platform. Regardless of whether you have logged in or created an ALDEA Travel account, we may collect this information.
- **Cookies and Similar Technologies as described in our [Cookie Policy](#).**

2.4 Third-party personal information we collect.

We collect personal information from other sources, such as:

- **Third-Party Services.** Using a third-party service (such as Google, Facebook, Instagram) to link, connect, or login to ALDEA Travel Platform allows the service to send us information such as your registration, friends list, and profile information, as that service controls or as you authorise it via your privacy settings.
- **Background Information.** According to applicable law, we may obtain, for UK Members, criminal records, sex offender registrations, and other information about you and/or your background. To the extent permitted by applicable laws and with your consent, we may obtain local police, background, and registered sex offender checks for Members outside the United Kingdom. Such reports may be obtained using your information, including your full name and date of birth.
- **Co-travelers.** Those who invite you to the ALDEA Travel Platform, such as co-travelers on a trip, can submit information about you, including your email address.



- **Other Sources.** Our third party service providers and/or partners may provide us with additional information about you, such as references, demographic data, or information to help detect fraud and safety issues, and we may combine it with information we already have about you to the extent permitted by applicable law. For fraud prevention and risk assessment, we may receive background check results or fraud warnings from identity verification service providers. Our partners may provide us with information about your activities on and off ALDEA Travel Platform, or about your experiences and interactions. Health information about contagious diseases, including but not limited to, health information may be provided to us.

3. HOW WE USE INFORMATION WE COLLECT

3.1 Provide, Improve, and Develop the ALDEA Travel Platform. Such as to:

- Make and receive payments through the ALDEA Travel Platform,
- Provide you with a means of communicating with other members,
- process your request,
- Conduct research, analytics, and debugging
- provide customer service, training,
-
- Keep you updated with security alerts, account notifications, and messages,
- Your contact information, such as your friends' or co-travelers', may be processed by us in the following ways: (i) for referral invitations, (ii) to facilitate trip planning and sharing your trip details, (iii) to detect fraud and prevent it, and (iv) for any other purpose you authorise.
- Personalised and customised experiences based on the actions you take on the ALDEA Travel Platform, your search and booking history, your profile information and preferences, and other content you provide.

3.2 Foster a Trusted and Safer Environment. Including to:

- detect and prevent fraud, spam, abuse, security and safety incidents, and other harmful activity,
- study and combat discrimination consistent with our [Nondiscrimination Policy](#),



- Assess security risks and conduct security investigations,
- Verify or authenticate the information you provide,
- Check databases and other information sources, such as police records and background checks,
- In addition to complying with our legal obligations, we are committed to protecting the health and well-being of the Guests, Hosts, and guests' employees, as well as the public at large.
- Provide information to your co-host or additional guests about disputes relating to your role as a co-host or additional guest, and resolve disputes with our Members,
- Ensure that our agreements with third parties are enforced,
- To comply with the law, respond to legal requests, prevent harm, and protect our rights (see section 4.5),
- enforce our [Terms](#) and other policies (e.g. [Nondiscrimination Policy](#)), and
- Using the ALDEA Travel Platform, your profile information, other content you submit to ALDEA Travel, and information obtained from third parties, we may conduct profiling. You may be restricted or suspended from using the ALDEA Travel Platform if automated processes detect activity that poses a safety or other risk to ALDEA Travel, our community, or third parties based on your account and activities on the ALDEA Travel platform, along with information related to activities on and off the ALDEA Travel platform. Please contact us via the Contact Information section below if you wish to challenge decisions based on automated processes.

3.3 Providing, personalising, measuring, and improving our advertising and marketing. For example to:

- Through social media platforms, send you promotional messages, marketing, and advertising based on your preferences,
- Enhance our advertising by personalising, measuring, and improving it,
- Organise and administer referral programs, rewards, surveys, contests, sweepstakes, and other promotional activities or events sponsored by ALDEA Travel or its third-party partners.
- In order to send you promotional messages, marketing, advertising, and other information that we think might be of interest to you, we analyse your characteristics and preferences.



- Organise events and provide relevant opportunities for you.

3.4 Provide payment processing services. Personal information is used to enable, or authorise third parties to use, Payment Services such as to:

- Detecting and preventing money laundering, fraud, abuse, and security incidents,
- Assess security risks and conduct security investigations,
- Ensure compliance with legal obligations (such as anti-money laundering laws),
- Ensure that the Payment Terms and other payment policies are followed,
- Depending on your preferences, send you promotional messages, marketing, advertising, and other information that may be of interest to you.
- provide Payment Services.

4. SHARING & DISCLOSURE

4.1. OTHER CONTROLLERS OF MY PERSONAL INFORMATION

4.1.1 Payments Controller

The Privacy Policy also applies to the Payment Services provided to you by ALDEA Travel Payments pursuant to the Payments Terms of Service ("Payments Terms").

When using the Payment Services, you will also be providing your personal information to one or more ALDEA Travel Payments entities (the "Payments Controller"), which will be responsible for your information related to the Payment Services, generally depending on your country of residence.

3. PROCESSING OF PAYMENTS INFORMATION

3.1 Information Required for Payment Services

To comply with applicable law (including anti-money laundering regulations), the Payments Controller must collect the following information from you. Without it, you will not be able to use Payment Services.

- Payment Information. In order to process payments and comply with applicable law, the Payments Controller requires certain financial information (such as your bank account or credit card information).



- Identity Verification and Other Information. The Payments Controller may require identity verification information (such as images of your government issued ID document(s), passport, national ID card, tax ID, or driving licence) or other authentication information (such as your date of birth, address, email address, or phone number) and other information in order to verify your identity, provide Payment Services to you, and comply with applicable law.

3.2 How the Payments Controller Uses Personal Information Collected

We may use personal information as a part of Payment Services to:

- Enable or authorise third parties to use the Payment Services,
- Detect and prevent money laundering, fraud, abuse, and security incidents,
- Conduct security investigations and risk assessments,
- 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
- Provide and improve the Payment Services.

4.1 Sharing With Your Consent.

When you consent to ALDEA Travel sharing your information, such as when approving a third-party application to access your account or participating in promotional activities by ALDEA Travel, we share your information as described at the time of consent.

In accordance with applicable law, we may use certain information about you such as your email address, de-identify it, and share it with social media platforms to generate leads, drive traffic to ALDEA Travel, or promote our products.

4.2 Sharing Between Members.

We may need to share certain information to facilitate bookings or other interactions between Members, such as:

- When a booking request is made, when there is a co-host, or when a dispute is submitted, certain information may be shared between Guest(s) and Host(s), such as a guest's profile, name, any additional guests' names, cancellation history, reviews, guest's age (unless prohibited by applicable law), and dispute outcome (when



applicable). When a booking is confirmed, additional information is shared to assist with coordinating the trip, like profile photo and phone number. When you as a Host have a confirmed booking, certain information is shared with the Guest (and any additional Guests they invite, if applicable) to coordinate the booking, such as your profile, full name, phone number, and Listing address.

- In the event that you invite a Member to host with you, you authorise that person to access and update your Member Content, including, but not limited to, your full name, your phone number, your accommodation address, your calendar, your listing information, your listing photos, and your email address, among others.
- Whenever you invite additional Guests to a booking, your name, travel dates, Host name, Listing details, and other related information will be shared with them.

4.3 Your Profile, Listings, and Public Information.

You can make certain information publicly visible to others, such as:

- Including your profile photo, first name (or initials, if applicable), description, and city on your public profile page.
- Pages that include details about the Experience, such as its approximate or precise location, calendar availability, profile photo, and aggregated demand information (such as page views over time).
- Public reviews, ratings, and comments.
- Community or discussion forum posts, blogs, or social media posts.

The Content you make available to the public, such as Listing details, may be displayed on third-party sites, platforms, and applications.

Information you share publicly on the ALDEA Travel Platform may be indexed through third-party search engines

4.4 Adherence to the law, responses to legal requests, prevention of harm, and protection of our rights.

Our company may disclose your information to courts, law enforcement, government or public authorities, tax authorities, or authorised third parties, where required or permitted by law or where disclosure is reasonable to: (i) comply with our legal obligations, (ii) comply with a valid legal request (such as a subpoena or court order) or to respond to claims asserted against



ALDEA Travel, (iii) respond to a valid legal request relating to a criminal investigation to address alleged or suspected illegal activity, or to respond to or address any other activity that may expose us, you, or any other of our users to legal or regulatory liability, (iv) enforce and administer our agreements with Members, including our [Terms](#), or (v) protect the rights, property or personal safety of ALDEA Travel, its employees, its Members, or members of the public. As an example, tax authorities or other governmental agencies may receive Host tax information if permitted by the foregoing circumstances.

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 bodily harm to an individual or group, or create or increase a risk of fraud upon or harm to ALDEA Travel, our Members, or expose ALDEA Travel to a claim of obstruction of justice.

Hosts' and/or Guests' information may be disclosed to tax authorities as required or permitted by applicable law for the purposes of determining proper compliance with relevant tax obligations. In addition to ALDEA Travel's tax obligations on service fees, it facilitates taxes on accommodations and withholding taxes, as well as Hosts' individual tax obligations.

Information that may be disclosed includes, but is not limited to, Host and Guest names, listing addresses, Host addresses, tax/business identification number(s), date of birth, and/or contact information, property parcel identification numbers, payout information, transaction dates and amounts, number of nights and Guests booked, gross and net booking value and payout amounts, taxes collected by ALDEA Travel on behalf of Guests and Hosts, to the extent any of this information is known by ALDEA Travel.

In jurisdictions where ALDEA Travel facilitates or requires a registration, notification, permit, or licence application or number of a Host with a governmental authority, we may share information of participating Hosts with the relevant authority, both during the application process, when the Listing is published, and periodically thereafter, such as the Host's full name and contact details, Accommodation address, tax identification number, registration, permit, or licence number, Listing details, reservation information, and number of nights booked subject to applicable laws.



4.5 Service Providers.

We share personal information with affiliated and unaffiliated service providers to help us run our business and for their compliance purposes, including service providers that 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 ALDEA Travel 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 similar claims. These providers are contractually bound to protect your personal information and have access to your personal information to perform these tasks.

4.9 Business Transfers.

A merger, acquisition, reorganisation, sale of assets, bankruptcy, or insolvency event may result in some or all of ALDEA Travel's assets being sold, transferred, or shared, including your information, as part of such transaction (e.g., due diligence) or in contemplation of such a transaction. If this occurs, we will notify you before your personal information is transferred and becomes subject to a different privacy policy.

5. OTHER IMPORTANT INFORMATION

5.1 Analysing your Communications.

ALDEA Travel Platform may review, scan, or analyse your communications for a variety of reasons outlined in the “How We Use Information We Collect” section of this policy, such as fraud prevention, risk assessment, regulatory compliance, investigations, product development, research, analytics, enforcing our Terms of Service, and providing customer support. Among other things, we scan and analyse messages to mask contact information and references to other sites as part of our fraud prevention efforts. Occasionally, we may scan, review, or analyse messages to debug, improve, or expand our products. Whenever possible, we use



automated methods. Occasionally, we may need to review communications manually, such as for fraud investigations or customer support, or to assess and improve their functionality. Neither we nor third parties will review, scan, or analyse your messaging communications to send you third-party marketing messages.

5.2 Third-Party Partners & Integrations.

ALDEA Travel may link to third-party services, such as Google Maps/Earth, which are not owned or controlled by ALDEA Travel. Use of these services is subject to the privacy policies of those providers, such as [Google Maps/Earth Additional Terms of Use](#), [Google Privacy Policy](#) (see [here](#) for more information on how Google uses information), ALDEA Travel does not own or control these third parties and when you interact with them you are providing your information to them.

6. YOUR RIGHTS

You can exercise any of the rights described in this section consistent with applicable law.

6.1 Managing Your Information.

Some of your personal information can be accessed and updated through your Account settings. If you connected your ALDEA Travel Account to a third-party service, like Facebook or Google, you can change your settings and unlink from that service in your Account settings. You are responsible for keeping your personal information up to date.

6.2 Portability and access to data.

Depending on your jurisdiction, you may be entitled to request copies of your personal information or information about how we handle it. In some jurisdictions, you may be able to request a structured, commonly used, machine-readable format of the information you have provided to us, and/or that we transmit this information to another service provider (where technically feasible).

6.3 Erasure of data.

You can request the deletion of your personal information in some jurisdictions. If you request deletion of your personal information, or if your account is suspended, terminated, or voluntarily closed:



- For legitimate business interests, such as preventing money laundering, detecting and preventing fraud, and enhancing safety, we may retain your personal information. If we suspend an ALDEA Travel Account for fraud or safety reasons, we may retain information about that ALDEA Travel Account to prevent that Member from opening a new ALDEA Travel Account.
- For the purposes of complying with our legal obligations, we may retain and use your personal information. Information may be kept by ALDEA Travel and Payment service providers for tax, legal, and auditing purposes.
- Even after your ALDEA Travel Account is cancelled, information you have shared with others (e.g. reviews, forum posts) will remain publicly visible. It will, however, be removed from any information attributed to you. Log records, for example, are stored in our database, but are disassociated from your personal information.
- As part of our efforts to protect data from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems immediately.

7. SECURITY

Despite the fact that no organisation can guarantee perfect security, we continue to implement and update administrative, technical, and physical security measures to ensure that your information is not accessed, destroyed, or altered without your permission.

8. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may be modified at any time in accordance with applicable law. When we revise the Privacy Policy, we will update the "Last Updated" date at the top of the page. We will also notify you of material changes by email thirty (30) days before the effective date of the modification. You can cancel your Account if you do not agree with the revised Privacy Policy. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of the ALDEA Travel Platform will be subject to the revised Privacy Policy.

9. CONTACT INFORMATION AND RESPONSIBLE ALDEA Travel ENTITIES



For questions or complaints about this Privacy Policy or ALDEA Travel's handling of personal information (i) contact ALDEA Travel by directly to info@aldea.travel; (ii) for payments related matters please use the contact information provided in the [Payments Terms of Service](#) page.