



Ecosystem.™

Ecosystem is a trading name of Ecosystem Labs Ltd.

User Privacy Policy for ecosystem.life & Mobile Applications

2020

Ecosystem (hereinafter referred to as “**Ecosystem**”, “**we**”, “**us**” or “**our**”) operates a platform and community marketplace that helps people form offline experiences and relationships directly with one another, where they can create, list, discover and book unique accommodations around the world, whether through our website or our mobile applications (“**Platform**”).

This Privacy Policy is intended to inform you about how we treat Personal Information that we process about you. If you do not agree to any part of this Privacy Policy, then we cannot provide the Platform or Services to you, and you should stop accessing the Platform and deactivate your Ecosystem Account. You can deactivate your Ecosystem Account by sending a email to cancellations@ecosystem.life

DEFINITIONS

Terms of Service.

1. **"Affiliates"** means companies related by common ownership or control. Financial and non-financial companies.
2. **"Aggregated Information"** means information about all of our users or specific groups or categories of users that we combine together so that it no longer identifies or references an individual user.
3. **"Data Controller"** means Ecosystem, the company responsible for the use and processing of Personal Information.
4. **"Third Parties"** means companies or persons not related by common ownership or control (i.e. non-affiliates) or other unrelated individuals. Third Parties can be financial and non-financial companies, or persons other than you and Ecosystem.
5. **"Personal Information"** means information (which may include sensitive information) relating to a living individual who is or can be identified either from that information or from that information in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller.

INFORMATION GATHERED

A. Information you provide to Ecosystem

We receive, store and process information, including Personal Information, that you make available to us when accessing or using our Platform and Services.

Examples would include when you:

1. fill in any form on the Platform, such as when you register or update the details of your user account, or when you supply ID and other verification information
2. access or use the Platform, such as to search for tokens, send or accept a invites, pay for purchases, and any associated services that may be available, post comments or reviews, or communicate with other users
3. link your account on a Third-Party site (e.g. Facebook) to your Ecosystem Account, in which case we will obtain the Personal Information that you have provided to the Third-Party site, to the extent allowed by your settings with the Third-Party site and authorized by you
4. communicate with Ecosystem; and or
5. share information with another Member

B. Information we get from your use of our Platform

We also receive, store and process information, possibly including Personal Information, when you access or use our Platform and Services, including but not limited to

Mobile Data

When you use certain features of the Platform, in particular our mobile applications we may receive, store and process different types of information about your location, including general information (e.g. IP address, zip code) and more specific information (e.g. GPS-based functionality on mobile devices used to access the Platform or specific features of the platform). If you access the Platform through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details.

Log Data

We may also receive, store and process Log Data, which is information that is automatically recorded by our servers whenever you access or use the Platform, regardless of whether you are registered with Ecosystem or logged in to your Ecosystem Account, such as your IP Address, the date and time you access or use the Platform, the hardware and software you are using, referring and exit pages and URLs, the number of clicks, device event information, pages viewed and the order of those pages, and the amount of time spent on particular pages.

Cookies and Tracking Technologies

Ecosystem uses cookies and other similar technologies, such as mobile application and other device identifiers, on the Platform. We may also allow our business partners to use their cookies and other tracking technologies on the Platform. As a result, when you access or use the Platform, you will provide or make available certain information to us and to our business partners.

While you may disable the usage of cookies through your browser settings, we do not change our practices in response to a “Do Not Track” signal in the HTTP header from your browser or mobile application. We track your activities if you click on advertisements for Ecosystem services on Third-Party platforms such as search engines and social networks, and may use analytics to track what you do in response to those advertisements.

We may, either directly or through Third Parties engage to provide services to us, including to continue to track your behavior on our own Platform for purposes of our own customer support, analytics, research, product development, fraud prevention, risk assessment, regulatory compliance, investigation, as well as to enable you to use and access the Platform and pay for your activities on the Platform. We may also, either directly or through Third-Parties we engage to provide services to us, track your behavior on our own Platform to market and advertise our services to you on the Platform and Third-Party websites. Third Parties that use cookies and other tracking technologies to deliver targeted advertisements on our Platform and/or Third-Party websites may offer you a way to prevent such targeted advertisements by opting-out at the websites of industry groups such as theNetwork Advertising Initiative and/or the Digital Advertising Alliance. You may also be able to control advertising cookies provided by publishers, for example Google’s Ad Preference Manager. Please note that even if you choose to opt-out of receiving targeted advertising, you may still receive advertising on or about the Platform – it just will not be tailored to your interests. In addition, if you disable cookies, you may lose some of the features and functionality of using our Platform, Application and Services, as cookies are necessary to track and enhance your use and access.

Third Parties may not collect information about users’ online activities on the Platform except as described in this policy and our Cookie Policy.

Third-Party social plugins

Our Platform may use social plugins which are provided and operated by Third-Parties, such as Facebook’s Like Button.

As a result of this, you may send to the Third-Party the information that you are viewing on a certain part of our Platform. If you are not logged into your account with the Third-Party, then the Third Party may not know your identity. If you are logged into your account with the Third Party, then the Third Party may be able to link information about your visit to our Platform to your account with them. Similarly, your interactions with the social plugin may be recorded by the Third Party.

Please refer to the Third Party’s privacy policy to find out more about its data practices, such as what data is collected about you and how the Third Party uses such data.

USE AND PROCESSING INFORMATION THAT USER PROVIDES

We use, store and process information about you for the following general purposes:

1. to enable you to access and use the Platform
2. to enable you to communicate with other Members, including but not limited to by sending them messages
3. to operate, protect, improve and optimize the Platform, Ecosystem’s business, and our users’ experience, such as to perform analytics, conduct research, personalize or otherwise customize your experience, and to provide customer service
4. to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you
5. to send you marketing, advertising, and promotional messages and other information that may be of interest to you, including information about Ecosystem, our services, or general promotions for partner campaigns and services. You can unsubscribe or opt-out from receiving these communications in your settings (in the “Account” section) when you login to your Ecosystem Account

6. to administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Ecosystem or our Third Party business partners; and
7. to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with Third Parties

How Ecosystem Uses and Processes User Communications

We may, either directly or through Third-Parties we engage to provide services to us, review, scan, or analyze your communications with other users exchanged via the Platform for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research and customer support purposes. For example, as part of our fraud prevention efforts, the Platform may scan and analyze messages to mask contact information and references to other websites. This helps to prevent fraudulent actors from asking members to send them money outside of the Platform, such as by bank transfer or other money transfer methods. We may also scan, review or analyze messages for research and product development purposes to help make search, booking and user communications more efficient and effective, as well as to debug, improve and expand product offerings. We will not review, scan, or analyze your communications for sending Third-Party marketing messages to you. We will also not sell these reviews or analyses of communications to Third Parties. We will also use automated methods to carry out these reviews or analyses where reasonably possible. However, from time to time we may have to manually review some communications. By using the Platform, you consent that Ecosystem, in its sole discretion, may, either directly or through Third-Parties we engage to provide services to us, review, scan, analyze, and store your communications, whether done manually or through automated means.

HOW PERSONAL INFORMATION IS DISCLOSED OR SHARED

IMPORTANT:

Your Personal Information may be disclosed as follows:

1. Parts of your public profile page that contain some Personal Information may be displayed in other parts of the Platform to other users for marketing purposes or if you post content in a community forum or other features on the Platform that are visible to the general public.
2. Your public Listing page will always include some minimum information such as the city and neighborhood and any additional information you share with other Members. Your public Listing page may also include aggregate demand information (such as number of page views over a period of time). Parts of your public Listing page may be displayed in other parts of the Platform to other Members and/or Third Party platforms for marketing purposes. The Platform allows your public profile to be included in search engines. If you change your settings or the information on your public profile, Third-Party search engines may not update their databases quickly or at all. We do not control the practices of Third-Party search engines, and they may use caches containing outdated information, including any information indexed by the search engine before you change your settings or the information on your public profile or public Listing pages.
3.
 - a. some of the information you provide to us from the linking of your accounts may be published on your Ecosystem Account profile
 - b. your activities on the Platform may be displayed to your Friends on the Platform and/or that Third-Party site
 - c. a link to your public profile on that Third-party social networking site may be included in your Ecosystem public profile
 - d. other Ecosystem 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
 - e. other Ecosystem 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 site(s)
 - f. 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
 - g. the publication and display of information that you provide to Ecosystem through this linkage is subject to your settings and authorizations on the Platform and the Third-Party site
 - h. We may distribute parts of the Platform (including your Listing) for display on sites operated by Ecosystem's business partners and affiliates, using technologies such as HTML widgets. If and when your Listings are displayed on a partner's site, information from your public profile page may also be displayed
 - i. Ecosystem may provide your Personal Information to its Affiliates, including Ecosystem Payments, and their employees, to use and process your Personal Information in the same way and to the same extent that we are permitted to under this Privacy Policy. These related entities comply with the same obligations

that we have to protect your Personal Information under this Privacy Policy. Ecosystem Payments may share your Personal Information for (i) their everyday business purposes; (ii) to jointly market products or services to you with other financial Third Parties with whom Ecosystem Payments has a formal agreement; and (iii) with respect to information about your transactions and experiences only, for their Affiliates' everyday purposes. You can unsubscribe or opt-out from receiving marketing communications in your settings (in the "Account" section) when you login to your Ecosystem account

- j. You acknowledge, consent and agree that Ecosystem may access, preserve and disclose your account information and Collective Content if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary (a) to respond to claims asserted against Ecosystem; (b) to comply with legal process (for example, subpoenas and warrants); (c) to enforce and administer our agreements with users, such as the Terms of Service, the Payments Terms of Service, this Privacy Policy, (d) for fraud prevention, risk assessment, investigation, customer support, product development and debugging purposes; or (e) to protect the rights, property or personal safety of Ecosystem, its users or members of the public
4. We will use commercially reasonable efforts to notify users about law enforcement requests for their data unless
 - a. providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law; or
 - b. we believe that providing notice would (a) be futile, (b) be ineffective, or (c) would create a risk of injury or bodily harm to an individual or group, or (d) create or increase a risk of fraud upon Ecosystem's property, its Members, the Platform, Application, or Services (collectively, "Risk Scenarios")
5. In instances where Ecosystem complies with legal requests for user data without notice to the user for the reasons described above, Ecosystem will use commercially reasonable efforts to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no Risk Scenarios apply
6. We may also publish, disclose and use Aggregated Information and non-personal information for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes

BUSINESS TRANSFERS BY ECOSYSTEM

If Ecosystem undertakes or is involved in any merger, acquisition, reorganisation, sale of assets or bankruptcy or insolvency event, then we may sell, transfer or share some or all of our assets, including your Personal Information. In this event, we will notify you before your Personal Information is transferred and becomes subject to a different privacy policy.

HOW TO ACCESS YOUR INFORMATION

You may review, update, correct or delete the Personal Information in your Ecosystem Account. If you would like to correct your information or cancel your Ecosystem Account entirely, you can do so by logging in to your Ecosystem Account. Please also note that any reviews, forum postings and similar materials posted by you may continue to be publicly available on the Platform in association with your first name, even after your Ecosystem Account is cancelled.

SECURING YOUR PERSONAL INFORMATION

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your Personal Information against unauthorized access, destruction or alteration. However, no method of transmission over the Internet, and no method of storing electronic information, can be 100% secure. So, we cannot guarantee the security of your transmissions to us and of your Personal Information that we store.

YOUR PRIVACY WHEN YOU ACCESS THIRD-PARTY RESOURCES

The Platform will contain links to other websites not owned or controlled by Ecosystem. Ecosystem does not have any control over Third-Party websites. These other websites may place their own cookies, web beacons or other files on your device, or collect and solicit Personal Information from you. They will have their own rules about the collection, use and disclosure of Personal Information. We encourage you to read the terms of use and privacy policies of the other websites that you visit.

You are entitled to see and challenge any information that Third Parties may provide to us as part of our fraud detection, prevention and risk assessment efforts in circumstances where all of the following factors apply: (i) if we use Third Parties to carry out automated checks or risk assessments, and (ii) if we make a decision which has legal consequences for you or which significantly affects you, and (iii) if such decision is based solely on such automated checks or risk assessments. In order to request this, please address your request directly to Ecosystem. Please state clearly in your request that you wish to see and/or challenge the information that Third Parties may have provided to Ecosystem as part of our fraud detection, prevention and risk assessment efforts. We may request proof of identification to verify your request.

SPECIAL FEATURES AND PROGRAMS

Referral service and requesting references

The Platform provides a referral service that allows you to invite your friends and contacts to use the Platform. The Platform also allows you to ask your friends and contacts to write a reference for you, to be published on your Ecosystem profile.

We may integrate the Platform with third party sites such as Facebook, so that you can send invitation messages or requests for references via the third party site itself. These messages will be sent by the third party site, and Ecosystem does not collect or retain the contact information that is used to send them.

You may also send invitation/request emails via the Platform itself, in which case we will ask you for the contact information to which to send your invitation/request. You can type in the email addresses or other contact information manually, or you can choose to import the contacts in your address book(s). In both cases, we may use and store this information for the sole purposes of allowing you to send your friends and contacts an invitation or request for a reference, and for fraud detection and prevention. With respect to referrals, we will also store the email addresses of your invitees to track if your friend joins Ecosystem in response to your referral.

If you request us to import your contacts, we will collect, but not store, the username and password for the email account you wish to import your contacts from. We will use this information only for the purpose of importing your contacts.

Affiliate Program

If you are allowed to join Ecosystem's Affiliate Program and you sign up for it, you will have to provide us with certain Personal Information to enable us to provide the Affiliate Program to you.

Meetups

The Platform may allow registered account holders to organize, search for or participate in offline events ("Meetups") in selected cities.

If you organize a Meetup or indicate that you will attend one, this information, together with some of your public information (such as your profile picture and public profile page) and any messages that you post about that Meetup, will be visible to users who browse the event. However, Ecosystem will never disclose where you are staying to another meetup user.

CHANGES TO THIS PRIVACY POLICY

We may change how we collect and then use Personal Information at any time and without prior notice, at our sole discretion. We may change this Privacy Policy at any time. If we make material changes to the Privacy Policy, we will notify you either by posting the changed Privacy Policy on the Platform or by sending an email to you. We will also update the "Last Updated" date at the top of this Privacy Policy. If we let you know of changes through an email communication, then the date on which we send the email will be deemed to be the date of your receipt of that email.

It's important that you review the changed Privacy Policy. If you do not wish to agree to the changed Privacy Policy, then we will not be able to continue providing the Platform and Services to you, and your only option will be to stop accessing the Platform and Services and deactivate your Ecosystem Account. You can deactivate your Ecosystem Account by emailing cancellations@ecosystem.life stipulating to deactivate your account.

GOT FEEDBACK?

Your opinion matters to us! If you'd like to provide feedback to us about this Privacy Policy, please email us at . For all other questions or concerns, please email us at <https://ecosystem.life/contact>

COOKIE POLICY

Ecosystem uses "cookies" in conjunction with the Platform to obtain information. A cookie is a small data file that is transferred to your device (e.g. your phone or your computer) for record-keeping purposes. For example, a cookie could allow the Platform to recognize your browser, while another could store your preferences and other information.

Your browser may allow you to set how it handles cookies, such as declining all cookies or prompting you to decide whether to accept each cookie. But please note that some parts of the Platform may not work as intended or may not work at all without cookies.

Ecosystem cookies and Third Party cookies

Ecosystem may place our cookies on your device via the Platform. Accordingly, our Privacy Policy will apply to our treatment of the information we obtain via our cookies.

We may also allow our business partners to place cookies on your device. For example, we use Google Analytics for web analytics, and so Google may also set cookies on your device. As further explained below, Third Parties may also place cookies on your device for advertising purposes.

There are two types of cookies used on the Platform, namely “**persistent cookies**” and “**session cookies**”.

Session cookies will normally expire when you close your browser, while persistent cookies will remain on your device after you close your browser, and can be used again the next time you access the Platform.

Other technologies

The Platform may also use other technologies with similar functionality to cookies, such as web beacons and tracking URLs to obtain Log Data about users. We may also use web beacons and tracking URLs in our messages to you to determine whether you have opened a certain message or accessed a certain link.

Uses for Ecosystem cookies

Ecosystem uses cookies and similar tracking technologies for a number of purposes, such as the following:

- To enable, facilitate and streamline the functioning of the Platform across different web pages, devices and browser sessions
- To simplify your access to and use of the Platform and make it more seamless
- To monitor and analyze the performance, operation and effectiveness of the Platform, so that we can improve and optimize it
- To show you content (which may include advertisements) that is more relevant to you.
- For fraud detection and prevention

Uses for Third-Party cookies

Our partners' cookies are intended to obtain information to help them provide services to Ecosystem. For example, Third Parties we engage to provide services to us may track your behavior on our Platform to market and advertise Ecosystem listings or services to you on the Platform and Third-party websites, or to help us detect or prevent fraud or conduct risk assessments. Third Parties websites that use cookies and other tracking technologies to deliver targeted advertisements on our Platform and/or Third-Party websites may offer you a way to prevent such targeted advertisements by opting-out at the websites of industry groups such as the [Network Advertising Initiative](#) and/or the [Digital Advertising Alliance](#). You may also be able to control advertising cookies provided by publishers, for example Google's [Ad Preference Manager](#). Please note that even if you choose to opt-out of receiving targeted advertising, you may still receive advertising on or about the Platform – it just will not be tailored to your interests.

Disabling Cookies

Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies by visiting the Help portion of your browser's toolbar. If you choose to decline cookies, please note that you may not be able to sign in, customize, or use some of the interactive features of the Platform. Flash cookies operate differently than browser cookies, and cookie management tools available in a web browser will not remove flash cookies. To learn more about how to manage flash cookies, you can visit the [Adobe website](#) and make changes at the [Global Privacy Settings Panel](#).

Changes to this Cookie Policy

We can change this Cookie Policy at any time. If we make material changes to the Cookie Policy, we will let you know either by posting the changed Cookie Policy on the Platform or by sending you an email.

It's important that you review the changed Cookie Policy. If you do not wish to agree to the changed Cookie Policy, then we cannot continue to provide the Platform to you, and your only option is to stop accessing the Platform and Services and deactivate your Ecosystem Account. You can deactivate your Ecosystem Account by sending an email to cancellations@ecosystem.life.