

Privacy Policy

Last Updated: Feb 6th, 2023

This Privacy Policy explains how information about you is collected, used and disclosed by kimkim, Inc. (“*kimkim*,” “*we*,” “*us*” or “*our*”) when you access or use our website located at <https://www.kimkim.com/> (the “**Site**”), mobile application and other online products and services (collectively, our “**Services**”) or when you otherwise interact with us.

A link to a PDF version of this Privacy Policy can be found here.

INFORMATION WE COLLECT AND PROCESS

We may collect one or more of the following categories of personal information about you, our partners, potential partners, visitors to the Site, and users of our Services, when these individuals (i) visit the Site; (ii) request additional information about our Services; (iii) register for our services; or (iv) otherwise interact with us.

Category of Personal Information Collected	Examples	Sources of Personal Information	Business Purpose for Collection of Personal Information
Identifiers	Name (First / Last Name), Postal Address, Email Address, Account Name/Unique Personal Identifier/Password, IP Address, your travel history (including countries you have visited and the frequency of your visits) and your future travel plans	Directly from our customers, visitors to our Site; users of our Services; cookies and other tracking mechanisms; third parties, including identity verification services, credit bureaus and publicly available sources. If you create or log into your account through a social media site, we will have access to certain information from that site, such as your name, account information and email address, in accordance with the authorization procedures determined by such social media site.	To Provide Services, Identification, Security, Legal / Regulatory / Compliance Issues.
Any categories of personal information described in	limited payment information, such as payment card type and expiration date and the last four digits of your payment card number; however, we do not collect	Directly from our customers, visitors to our Site; users of our Services; cookies and	To Provide Services, Identification, Security, Legal / Regulatory / Compliance Issues.

subdivision (e) of Section 1798.80.	or store full payment card numbers and all transactions are processed by our third party payment processor. If you offer products or services for sale through our Services, we will also collect your bank account information;	other tracking mechanisms.	
Protected characteristics under California or federal law	National origin, citizenship, sex (including gender, gender identity, gender expression), age, and any other information contained in passport records; medical condition, physical or mental disability.	Directly from our customers and users of our Services	Benefit administration, legal issues/compliance, and to provide our Services where such Services (e.g. hotel bookings) require collection of sensitive information such as passport data
Commercial Information	Records of products or Services purchased or obtained.	Directly from our customers, visitors to our Site and our investors.	To Provide Services, Identification, Security, Legal / Regulatory / Compliance Issues.
Internet or other electronic network activity information	including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.	Cookies and other tracking mechanisms.	To Provide and Improve Services, Identification, Security, Legal / Regulatory / Compliance Issues.
Geolocation data	Physical location	Directly from our customers who allow geolocation while using our Services	To provide users with accurate time zone information, and serve geographically appropriate consumer disclosures and notices

Except as disclosed above, we do not collect the following categories of personal information via our Site: protected characteristics under applicable laws; biometric information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information; professional or work-related information; education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99); or inferences drawn from other personal information.

Sensitive Personal Information: Under the California Privacy Rights Act (“CPRA”), businesses are required to provide details regarding the collection of any sensitive personal information. We do not collect any sensitive personal information as that term is defined under the CPRA.

Other Automatically Collected Information: Whether you are a visitor to our Site, partner or potential partner, our servers automatically collect limited information about your computer when you visit our Site. This information may include the type of browser software you use, the operating system you are running, the IP address assigned to your computer or Internet connection, and the IP address of the website, if any, that referred you to our Site. We use this information to understand how visitors navigate through our Sites, to enhance your experience while using our Site, and to make the materials we post as valuable to visitors as possible.

We process this personal information as necessary for us:

- To provide our Services to our partners, potential partners, and visitors to our Site;
- To fulfill our legitimate interests, including to manage our business operations; to take steps to prevent, detect or investigate crime, fraud, misconduct or any unlawful action or omission; to comply with policies and procedures under applicable regulations, guidelines or notices as well as our own policies and procedures;
- To inform you of our Services and relevant news; and
- For other purposes with notice to you and with your consent where necessary.

Legitimate Interests/Consent: To the extent we rely on our legitimate interests as a legal basis for processing of your personal information, we have considered the balance between our own interests (among other things, the lawful and efficient operation of our Services) and your interests and we believe that (a) you would reasonably expect us to carry out the kind of processing referenced above and (b) such processing will not cause you any harm and/or will not seriously impact your rights and freedoms with regard to data privacy. You have the right to withdraw any consent given to us for the processing of your personal information.

DISCLOSURES OF PERSONAL INFORMATION

- In order for us to provide our Services, we may share your personal information with the following circumstances: With vendors, consultants and other service providers who need access to such information to carry out work or perform services on our behalf;
- When you create a profile, participate in the interactive areas of our Services or interact with us on third-party social media sites, certain information that you provide may be displayed publicly, such as your name, profile photo, travel history and other information you choose to provide;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, rule, regulation or legal process;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property or safety of kimkim or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among kimkim and any current or future parent, subsidiary and/or affiliated company; and
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Advertising and Analytics Services Provided by Others

We may allow others to serve advertisements on our behalf and provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of our Services and other applications and websites, including your IP address, web browser, device type, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other applications and websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices.

We may also work with third-party social media sites, such as Facebook, to serve ads to you as part of a customized campaign, unless you notify us that you prefer not to have information about you used in this way. For more information about how you can opt out of customized campaigns, please see “Your Choices and Rights” below.

CROSS-BORDER TRANSFERS

We may transfer your personal information to a third party that is located in a jurisdiction other than the one from which we collected your personal information, including to countries that have not been deemed to have an adequate level of protection for the rights and freedoms of data subjects. If we do transfer your personal information to another jurisdiction, we will do so following due diligence and provided that the data recipient is subject to contractual agreements imposing obligations on it to ensure appropriate technical and organization measures are implemented and maintained at all times to prevent the unauthorized and unlawful processing of personal information, and the accidental loss or destruction of, or damage to, personal information, consistent with our obligations under applicable data protection laws.

RETENTION OF PERSONAL INFORMATION

We will only retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements. If we collect any biometric information about you, we will not store that information for longer than 3 years.

SECURITY OF PERSONAL INFORMATION

The security of all personal information provided to us is important and we take reasonable steps designed to protect your personal information. We maintain reasonable administrative, technical, and physical safeguards designed to protect personal information that we receive against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure or use.

YOUR CHOICES AND RIGHTS

Depending upon where you are located, certain choices and rights may be available to you under applicable data protection laws, including the right to request access to your personal information or to have your personal information deleted. If you have questions about what rights may apply to you, please contact us at team@kimkim.com.

Do Not Track: Our Site and Services are not designed to respond to "do not track" requests from browsers.

Account Information. You may update, correct or delete information about you at any time by logging in to your account and editing your information. If you wish to delete or deactivate your account, please email team@kimkim.com, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

Cookies and Web Storage. Where required by law, you will be shown a cookie consent notice and have the opportunity to opt in or out of use of cookies the first time you visit our Site. Please note that if you choose to remove or reject cookies or web storage, this could affect the availability and functionality of our Services.

Promotional Communications. You may opt out of receiving promotional emails or SMS messages from kimkim by following the instructions in those emails or messages. If you opt out, we may still send you non-promotional communications, such as those about your account or our ongoing business relationship.

Push Notifications. With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device or within our mobile applications.

For California Residents:

The CCPA provides California residents and/or their authorized agents with specific rights regarding the collection and storage of their Personal Information.

Your Right to Know: California residents have the right to request that we disclose the following information to you about our collection and use of your Personal Information over the past twelve (12) months. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

1. The categories of Personal Information we have collected about you.
2. The categories of sources for the Personal Information we have collected about you.
3. The specific pieces of Personal Information we have collected about you.
4. Our business or commercial purpose for collecting or selling your Personal Information.
5. The categories of third parties to whom we have sold or shared your Personal Information, if any, and the categories of Personal Information that we have shared with each third-party recipient.

Your Right to Opt Out of Sale: California residents have the right to opt-out of the sale of their Personal Information by submitting a request as directed on the homepage of our website or by contacting us using the information in the “Contact Us” section below.

Please note that we do not knowingly sell the personal information of any individuals under the age of 16.

Your Right to Delete: California residents have the right to request that we delete any of the Personal Information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete

the requested Personal Information in accordance with the CCPA, we will delete, and direct our third-party service providers to delete, your Personal Information from their records. Your request to delete Personal Information that we have collected may be denied if we conclude it is necessary for us to retain such Personal Information under one or more of the exceptions listed in the CCPA.

Non-Discrimination: You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA.

Verifying Your Request: Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. In the case of access and deletion, your request must be verifiable before we can fulfill such request. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information or a person authorized to act on your behalf. We will only use the personal information that you have provided in a verifiable request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority. Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive or manifestly unfounded.

For Individuals Located in the European Economic Area (EEA), the United Kingdom (UK) or Switzerland:

You have a number of rights under applicable data protection laws in relation to your personal information. Under certain circumstances, you have the right to:

- Have access to your personal information by submitting a request to us;
- Have your personal information deleted;
- Have your personal information corrected if it is wrong;
- Have the processing of your personal information restricted;
- Object to further processing of your personal information, including to object to marketing from us;
- Make a data portability request;
- Withdraw any consent you have provided to us;
- Restrict any automatic processing of your personal information; and
- Complain to the appropriate Supervisory Authority.

THIRD-PARTY LINKS

We may provide links to other sites or resources provided by third parties. These links are provided for your convenience only. We have no control over the contents of those sites or resources, and accept no responsibility for them or for any loss or damage that may arise from your use of them. If you decide to access any of the third-party links on the Site, you do so entirely at your own risk and subject to the terms and conditions of those sites.

CHILDREN

We do not knowingly collect personal information from children under the age of 13 through our Sites. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce our Privacy Policy by instructing their children never to provide us personal information. If you have reason to believe that a child under

the age of 13 has provided personal information to us, please contact us, and we will endeavor to delete that personal information from our databases.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. By accessing and using the Sites after we notify you of such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at: team@kimkim.com.

If you are located in the United Kingdom or European Economic Area (“EEA”) and believe we have not adequately resolved any issues, you may contact the Supervisory Authority concerned.