

PRIVACY POLICY

IDENTITY OF THE DATA CONTROLLER

Name : KUNEO SASU
Form : société par actions simplifiée à associé unique
Registered office : 25, rue de Ponthieu – 75008 PARIS
SIREN : 100799105 RCS PARIS
Legal representative : Sofian MAZOUZ

KUNEO operates a platform connecting hosts ("**Hosts**") and travelers ("**Travelers**"), designed to allow anyone to book accommodation, anywhere the service is available.

In this context, KUNEO takes the utmost care in protecting the Personal Data of Hosts, Travelers, and any user (the "**User**") browsing the website at <https://kuneo.eu> (the "**Platform**"), in accordance with European Regulation No. 2016/679 (GDPR).



Personal Data is legally defined as personal information that relates to and enables the identification of a natural person.

ARTICLE 1 - CATEGORIES OF PERSONAL DATA COLLECTED BY USER TYPE

1.1. Users. When creating their account, every User provides KUNEO with the following Personal Data:

- **Identity:** first and last name,
- **Contact details:** email address, billing postal address,
- **Profile photograph.**

In addition, during any User's browsing of the Platform, KUNEO automatically collects the following data:

- **Technical data:** IP address, browser type, operating system, pages visited, connection duration,
- **Cookies and trackers:** under the conditions described in Article 2 below.

Please note that when a User makes a booking and becomes a Traveler, they will also provide their payment data, which will be processed exclusively by Stripe Payments Europe Ltd (no raw payment card data is retained by KUNEO).

1.2. Hosts. When creating and publishing a listing, Hosts provide in particular the following data:

- **Identity:** first and last name or company name, legal form, SIREN/SIRET where applicable,
- **Contact details:** address of the accommodation, billing address, email address, Host's home address,

- **Tax data:** tax identification number(s) (TIN) in the Host's member state of tax residence, and VAT number,
- **Profile photograph.**

Please note that in order to receive payment for bookings made at their accommodation, the Host will also be required to provide the following data:

- **Banking and financial data:** IBAN and account information necessary for remittance of revenue via Stripe Connect, as well as the Know Your Customer (KYC) information required by applicable financial regulations,
- **Identity documents and supporting materials:** in connection with the KYC obligations imposed by Stripe or applicable regulations.

However, this Personal Data will be processed exclusively by Stripe Payments Europe Ltd (none of it is processed or retained by KUNEO).

ARTICLE 2 - COOKIES AND TRACKERS

KUNEO uses cookies and similar technologies. In accordance with the recommendations of the CNIL (French Data Protection Authority), certain cookies are subject to your prior consent:

Strictly necessary cookies (consent-exempt)

- Session and authentication cookies,
- Security cookies (CSRF protection),
- Cookies necessary for the proper functioning of the cart and the booking process,
- Language detection cookie.

Cookies subject to your consent

- Analytics cookies: audience measurement and Platform improvement. These cookies are only placed with your agreement,
- Personalization cookies: storing your browsing preferences.

You may set your preferences through the consent banner displayed on your first visit, or at any time through the privacy settings available on the Platform. You may also configure your browser to refuse cookies, which may affect certain Platform features.

ARTICLE 3 - PURPOSES AND LEGAL BASIS FOR DATA PROCESSING

Data	Purpose	Legal basis
First and last name, email address of Hosts and Travelers, address of the accommodation.	- Account creation and management, - Matchmaking and accommodation booking, - Sending transactional emails, - Management of cancellations, disputes, and refunds.	Performance of a contract (Art. 6.1.b GDPR).

Data	Purpose	Legal basis
User profil photograph.	Account creation, profile display for viewing by other Users.	Performance of a contract (Art. 6.1.b GDPR).
First and last name, billing address of Hosts and Travelers.	Invoicing (KUNEO's commission and service fees) and accounting.	Legal obligation (Art. 6.1.c GDPR).
Tax identification number(s) (TIN) and VAT number of the Host.	Compliance with KUNEO's reporting obligations under the DAC7 Directive framework.	Legal obligation (Art. 6.1.c GDPR).
First and last name, billing address of Hosts and Travelers.	Fraud prevention and Platform security.	Legitimate interest (Art. 6.1.f GDPR).
First and last name, email address of Hosts and Travelers.	Management and moderation of reviews and ratings.	Legitimate interest (Art. 6.1.f GDPR).
Technical cookies and trackers relating to Users.	Statistics and Platform improvement.	Legitimate interest (Art. 6.1.f GDPR).
Analytic cookies.	Improvement of the User experience.	Consent (Art. 6.1.a GDPR).
Email addresses.	Commercial prospecting and periodic newsletter distribution.	Consent (Art. 6.1.a GDPR).

3.1. KUNEO may also use artificial intelligence tools to assist in the moderation of content published on the Platform, including listings, Host and Traveler profiles, and reviews and ratings. These tools are used to detect inappropriate, fraudulent, or T&C-violating content. This processing is based on KUNEO's legitimate interest in ensuring the safety, reliability, and integrity of the Platform (Article 6.1.f GDPR).

In accordance with Article 22 of the GDPR, no decision producing significant legal effects with respect to you (such as the suspension or permanent deletion of your account) is made solely on the basis of automated processing, without human intervention. Any such decision is subject to review by a member of the KUNEO team, and you have the right to contest it in accordance with the procedure that will be communicated to you.

Note: where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing carried out prior to such withdrawal.

3.2. Internal messaging between Hosts and Travelers. KUNEO provides an internal messaging system enabling exchanges between Hosts and Travelers in connection with booking management.

Messages exchanged through this system are stored on KUNEO's servers. This retention is necessary for the performance of the contract and the proper management of relations between the parties (Article 6.1.b GDPR), as well as for the protection of KUNEO's legitimate interests in respect of Platform security and integrity (Article 6.1.f GDPR).

KUNEO reserves the right to access the content of messages in the cases exhaustively listed in Article 3.6.2 of the T&C, and upon judicial or administrative requisition from a competent authority. Outside these cases, KUNEO does not conduct any systematic reading of messages exchanged between users.

ARTICLE 4 - RETENTION PERIODS

Data category	Retention period
Account data (Hosts and Users).	Duration of the contract + 5 years for data necessary for contractual proof purposes (Art. 2224 of the French Civil Code).
Booking data and messaging exchanges related to the booking.	5 years from the date of the booking (commercial limitation period). Exchanges are also retained for this period, in order to facilitate resolution of any dispute between the Host and the Traveler that has not yet become time-barred.
Billing and accounting data (including tax data).	10 years (accounting and tax obligation — Art. L.123-22 of the French Commercial Code).
Payment data (transaction logs relating to payment of service fees and KUNEO's commission).	5 years (limitation period for payment obligations).
Email addresses for newsletter distribution.	3 years from the last active contact.
Cookies / trackers (analytics).	13 months maximum, in accordance with CNIL recommendations.
Reviews and ratings, profile photographs and first name.	Duration of the account. Reviews and ratings are subsequently retained but the author is anonymized.

Once the applicable retention period has expired, data is securely deleted or anonymized so as to no longer permit identification of the data subjects.

ARTICLE 5 - DATA FLOWS BETWEEN HOSTS AND TRAVELERS

5.1. Data accessible to the Traveler regarding the Host. In connection with a booking, the Traveler has access to the following information relating to the Host:

- Name or company name of the Host,
- Exact location of the accommodation (after booking confirmation),
- Reviews left by other Travelers.

5.2. Data accessible to the Host regarding the Traveler. After booking confirmation, the Host has access to the following information:

- First and last name of the Traveler.

Payment information (payment card data, IBAN) is under no circumstances transmitted from one party to the other: it is processed exclusively by Stripe in accordance with its own data protection policy.

5.3. Mutual confidentiality obligation. Hosts and Users undertake, under the Terms and Conditions of Use and Sale (T&C), not to use other parties' Personal Data for any purpose other than the performance of the booking, and not to disclose it to any unauthorized third parties. KUNEO oversees the conduct of these exchanges within the limits set by the Platform and its T&C.

ARTICLE 6 - DATA RECIPIENTS

In the context of the processing described herein, your data may be communicated to the following categories of recipients:

6.1. Technical service providers and sub-processors:

- **Stripe Payments Europe Ltd:** for the purely technical processing of payments (execution of a transaction at KUNEO's request and in accordance with the parameters defined by KUNEO). Please note that Stripe also acts as an independent data controller for payment and KYC data, outside any sub-processing relationship with KUNEO (stripe.com/fr/privacy),
- **Platform host:** O2SWITCH, SAS with share capital of €100,000, SIRET 510 909 807 00032, RCS CLERMONT-FERRAND,
- **Technical processing host:** HOSTINGER INTERNATIONAL LIMITED, a private limited company incorporated under Cypriot law, 61 Lordou Vironos str. – 6023 LARNACA – Cyprus,
- **Transactional email sending tool:** BREVO, operated by SENDINBLUE, SAS with share capital of €388,177, registered at 17, rue de Salneuve – 75017 PARIS,
- **Analytics tool:** Google Analytics and Tag Manager,
- **Accounting management software:** PENNYLANE, SAS with share capital of €241,111.90, registered at 2, rue Jules Lefebvre – 75009 PARIS, registered under RCS PARIS 880 265 921.

6.2. Legally authorized authorities and third parties. KUNEO may be required to disclose personal data to competent judicial, tax, or administrative authorities in response to a legal obligation or judicial requisition. In connection with its obligations under the DAC7 Directive, KUNEO transmits, for example, the Host's personal data to the DGFIP.

ARTICLE 7 - TRANSFERS OUTSIDE OF THE EUROPEAN UNION

Some of our service providers may operate or store data outside the European Union. In such cases, KUNEO ensures that appropriate safeguards are in place:

- Standard Contractual Clauses (SCCs) approved by the European Commission,
- Binding Corporate Rules (BCRs), where applicable,
- Adequacy decision by the European Commission for the countries concerned.

Stripe Payments Europe Ltd is established in Ireland (European Union) and operates in compliance with the GDPR. Data transfers to Stripe Inc. (USA) may occur in the context of its activities, covered by the SCCs and any applicable EU-US adequacy framework.

ARTICLE 8 - DATA SECURITY

KUNEO implements appropriate technical and organizational measures to ensure the security, confidentiality, and integrity of your personal data, including in particular:

- Encryption of communications (HTTPS/TLS protocol),
- Protection measures appropriate to sensitive data stored in databases,
- Access controls and privilege segregation within the KUNEO team,
- Regular data backups,
- A data breach management procedure, including notification to the CNIL within 72 hours in the event of a breach likely to give rise to a risk to the rights and freedoms of individuals (Art. 33 GDPR).

Financial transactions are entirely delegated to Stripe, which complies with PCI DSS (Payment Card Industry Data Security Standard) standards.

ARTICLE 9 - YOUR RIGHTS

In accordance with Articles 15 to 21 of the GDPR, you have the following rights:

- **Right to information (Art. 13-14 GDPR):** to be informed of how your data is used.
- **Right of access (Art. 15 GDPR):** to obtain a copy of the data we hold about you.
- **Right to rectification (Art. 16 GDPR):** to correct inaccurate or incomplete data.
- **Right to erasure / "right to be forgotten" (Art. 17 GDPR):** to request the deletion of your data, subject to applicable legal retention obligations.
- **Right to restriction of processing (Art. 18 GDPR):** to suspend the use of your data in certain cases.
- **Right to data portability (Art. 20 GDPR):** to receive your data in a structured format and transmit it to another data controller, for processing based on consent or on the performance of a contract.
- **Right to object (Art. 21 GDPR):** to object to the processing of your data based on legitimate interest, in particular for commercial prospecting purposes.
- **Right to withdraw consent:** to withdraw previously given consent at any time, without affecting the lawfulness of prior processing.

- **Right to set post-mortem instructions:** to provide instructions regarding the processing of your data after your death (Art. 40-1 of the French Data Protection Act — *loi Informatique et Libertés*).

These rights may be exercised as follows:

By email	privacy@kuneo.eu
By mail	KUNEO SASU – 25, rue de Ponthieu – 75008 PARIS – A l’attention du Responsable RGPD
Response time	1 month from receipt, extendable by an additional 2 months in cases of complexity
Document of identification	Required in cases of reasonable doubt as to your identity

If you are dissatisfied with the handling of your request, you have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL):

CNIL
3, place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07
01.53.73.22.22
www.cnil.fr

ARTICLE 10 - UPDATES TO THE PRIVACY POLICY

KUNEO reserves the right to amend this Privacy Policy at any time, in particular to comply with any legislative or regulatory developments, or to reflect changes to the Platform.

In the event of a material amendment, you will be notified by email or by notification on the Platform at least 15 days before the new version takes effect. Continued use of the Platform after notification constitutes acceptance of the updated policy.