

# Mobile Simple Privacy Policy

Mobile Simple is committed to respecting your privacy and the confidentiality of your personal data.

This Privacy Policy is designed to assist you in understanding how Mobile Simple uses and safeguards the information you provide in using Mobile Simple's internet communications, Mobile Simple's websites and/or Mobile Simple's products.

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## 1. WHAT INFORMATION DOES MOBILE SIMPLE COLLECT AND USE?

Mobile Simple may gather and use information about you, including (but not limited to) information in the following categories:

- (a) Identification data (e.g. name of hotel/group, job title, first name, last name, address, telephone number, mobile number, email address);
- (b) Profile information (e.g. language preference and any information that you choose to make available to others as part of your Mobile Simple user profile as further described in Section 5);
- (c) Electronic identification data (e.g. IP addresses, cookies);
- (d) Banking and payment information (e.g. credit card information, account number);
- (e) Call quality and survey results;
- (f) Information about your usage of and interaction with Mobile Simple software, products, and websites (including computer, platform, device and connection information, client performance information, error reports, device capability, bandwidth, statistics on page views, and traffic to and from our websites, browser type and usage statistics);
- (g) Products or services ordered and delivered;

## 2. HOW DOES MOBILE SIMPLE USE THIS INFORMATION AND FOR WHAT PURPOSE?

Our primary purpose in collecting information is to provide you with a safe, smooth, efficient, and customized experience. Mobile Simple collects and uses, or has third party service providers acting on Mobile Simple's behalf collecting and using, personal data relating to you, as permitted or necessary to:

- provide Mobile Simple software and/or the Mobile Simple products, change and customize Mobile Simple features and functionality;
- take, process or deliver orders made via our websites, invoice you or notify you of the status of your order;
- provide other services for you;
- provide you with customer support and troubleshoot problems;
- compare information for accuracy;
- inform you about service updates and faults;
- request feedback or participation in on-line surveys;
- resolve disputes;
- verify your identity;
- customize, measure, and improve Mobile Simple software and websites;
- improve our search functionality and help you find and contact other Mobile Simple users more easily and accurately;
- organise and carry out Mobile Simple's marketing or promotional operations/offers, contests, games and similar events; and
- protect your and Mobile Simple's interests, including in particular to enforce our Terms of Service and prevent and fight against fraud, (together, the Purposes).

## 3. OUR DISCLOSURE OF YOUR PERSONAL INFORMATION

Except as provided below, Mobile Simple will not sell, rent, trade or otherwise transfer any personal data outside its controlled subsidiaries and affiliates without your explicit permission, unless it is obliged to do so under applicable laws or by order of the competent authorities. Please note that information that you voluntarily make public in your user profile, or which you disclose on forums, discussions boards or by posting comments will be publicly available and viewable by others.

Mobile Simple may disclose personal information to respond to legal requirements, exercise our legal rights or defend against legal claims, to protect Mobile Simple's interests, fight against fraud and to enforce our policies or to protect anyone's rights, property, or safety.

In order to provide you with Mobile Simple products you have requested, Mobile Simple may sometimes, if necessary, share your personal and traffic data with Mobile Simple's group companies, partner service providers and/or agents. For example the hosting services providers such as Microsoft Azur, distributors of Mobile Simple software and/or Mobile Simple products, and/or the third party banking organizations or other providers of payment, or customer support. Mobile Simple will always require these third parties to take appropriate organizational and technical measures to protect your personal data and traffic data and to observe the relevant legislation.

Mobile Simple, Mobile Simple's local partner, may provide personal data, communications content and/or traffic data to an appropriate judicial, law enforcement or government authority lawfully requesting such information. Mobile Simple will provide reasonable assistance and information to fulfill this request and you hereby consent to such disclosure.

Information that is collected by or sent to Mobile Simple may be stored and processed in the United States or any other country in which Mobile Simple or its affiliates, subsidiaries, or service providers maintain facilities. In this regard, or for purposes of sharing or disclosing data in accordance with this article 4, Mobile Simple reserves the right to transfer information outside of your country. By using Mobile Simple software, Mobile Simple's websites or Mobile Simple products you consent to any such transfer of information outside of your country. If Mobile Simple or substantially all of its assets were to be acquired by a third party, personal information of Mobile Simple users will generally be one of the transferred business assets. We reserve the right to include your personal information in any such transfer to a third party.

## 4. WHAT ARE COOKIES AND GIFS HOW DOES MOBILE SIMPLE USE THEM?

By using Mobile Simple's websites and/or software you are giving your consent to the use of cookies. You can choose to reject cookies at any time, either by changing your browser settings (if your browser permits) or by ceasing to use Mobile Simple's websites and/or software or by using the applicable opt-out functions. You should be aware that certain features are only available through the use of cookies and if you choose not to accept cookies, such features may not be available to you.

## 4.1 What are Cookies and GIFs?

### 4.1.1. Cookies

Cookies are small files containing a string of characters (text) that are sent to your browser from a website's server. The cookie may contain a unique identifier but it does not contain personally identifiable information such as your name or email address. Mobile Simple may use cookies when you visit its websites, use Mobile Simple's software or visit other websites where Mobile Simple serves advertisements. The browser of the Mobile Simple software client or your Internet browser stores the cookie on your computer's hard drive and this may be accessed by the website during your next visit. Other websites may also send cookies to your browser but your browser will not allow those websites to see Mobile Simple's cookie data.

### 4.1.2. Gifs

Mobile Simple web pages and client interfaces may include clear gifs, also known as web-beacons and tracking pixels. Gifs are tiny graphics with a unique identifier, which are used to count your visits to the page (but which do not retain any personally identifiable information). In addition, Mobile Simple uses clear gifs in our HTML-based emails to let us know which emails have been opened and acted upon. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns.

## 4.2 What type of Cookies does Mobile Simple use?

Mobile Simple uses session cookies, persistent cookies and local shared objects (flash cookies).

**Session cookies** are temporary cookies, or unique identifiers associated with your browser for the duration of your visit to Mobile Simple's websites or area of the Mobile Simple software client. Once you close your browser, the session cookie ID will disappear and information about your visit is not retained.

**Persistent Cookies** remain on your browser even after you close it and may be used by your browser on subsequent visits to the website.

**Local Shared Objects** or 'Flash Cookies' are cookies written with Adobe flash technology. These cookies are saved on your computer in the same way as other cookies but they cannot be managed at browser level in the same way.

## 4.3 How Mobile Simple uses Cookies

Mobile Simple uses its own cookies for a variety of purposes, including to:

1. recognize you when you sign in and understand how you arrived at our website, so we can make sure that we provide you with relevant customer content and information. For example:
  - if you arrived at our website by clicking on a link to hear about US subscription packages, we can make sure you see content relevant to those offers;
2. remember your chosen preferences, such as:
  - the language you choose to see our website in;
  - the currency you wish to see our prices in;
3. fight against fraud;
4. inform Mobile Simple about the version of the Mobile Simple software client you are using so that we can provide you with new software updates and direct you to the relevant help sections;
5. enable you to access your account and account services through the Mobile Simple Software client;
6. provide internal and customer analytics and gain statistics and metrics about our websites, such as total number of visitors and page views;
7. monitor the effectiveness and performance of our advertising and marketing campaigns and carry out research in order to help us to improve our products and websites;
8. initiate security measures such as 'time-out' when you have not logged into your account service area for a period of time;
9. populate your Mobile Simple client with one of your Mobile Simple contacts' information, where this contact invited you to join Mobile Simple;
10. deliver video content to you;

11. provide Mobile Simple ads most relevant to you when you visit other sites that display Mobile Simple ads.

#### 4.4. Third Party Content

Sometimes, Mobile Simple's websites may include widgets or embedded video content from third parties such as YouTube. When you view this content or use this widget, you may be accepting cookies from these websites. These cookies are not within our control and you should check with the relevant third party site for more information.

#### 4.5 Your Choices about Cookies

We don't recommend that you restrict or block cookies as this may impact on the functionality of our websites and products. However, if you choose to do so, please see the options available to you below. You can also find comprehensive information about cookies at [www.aboutcookies.org](http://www.aboutcookies.org).

##### 4.5.1 Browser Cookies

The Help option on the toolbar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, how to delete cookies or how to disable cookies altogether.

##### 4.5.2 Local Shared Objects (Flash Cookies)

You can manage the usage of flash cookies via [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html).

You may also manage flash cookies through your browser depending on how recent the version of Internet Explorer (or other browser) and media player you are using. Please also visit the Adobe website at <http://kb2.adobe.com/cps/526/52697ee8.html>

## 5. YOUR USER PROFILE

Your user profile is the information provided by you at registration or later which is displayed in your Mobile Simple profile in the Mobile Simple software client, in the Mobile Simple search directory and on your personal details page in your account on [www.Mobile-Simple.com](http://www.Mobile-Simple.com). It may include your Mobile Simple username, name of hotel property/group, full name, address, telephone and mobile numbers, gender, country, language, and any other information that you decide to make available. You can access your user profile from the "Mobile Simple" menu in the Mobile Simple software client or from your account on [www.Mobile-Simple.com](http://www.Mobile-Simple.com) in order to view, correct or complete information, remove non-mandatory information; and to see the privacy settings associated with your profile information.

## 6. LINKED WEBSITES AND THIRD PARTY APPLICATIONS

Mobile Simple websites may contain links that will let you leave Mobile Simple's website and access another website. Linked websites are not under the control of Mobile Simple and these websites have different privacy policies. The Mobile Simple Privacy Policy applies solely to personal information that is acquired on the websites or through your use of the Mobile Simple software, Mobile Simple products and/or your relationship with Mobile Simple, so Mobile Simple urges you to be careful when you enter any personal information online. Mobile Simple accepts no responsibility or liability for these other websites.

If you use any extras, plug-ins or third party applications together with the Mobile Simple software or use any third party applications or products that incorporate or embed the Mobile Simple software ("Applications"), the provider of such Applications may obtain access to certain personal information about you. Mobile Simple does not and cannot control how the provider of Applications may use any personal information connected in connection with such Applications. Please ensure that you review any privacy policies or other terms applicable to the use of such Application before installation.

## 7. HOW DOES MOBILE SIMPLE PROTECT YOUR PERSONAL INFORMATION?

Mobile Simple will take appropriate organizational and technical measures to protect the personal data and traffic data provided to it or collected by it with due observance of the applicable obligations and exceptions under the relevant legislation. Your personal and traffic data can only be accessed by authorized employees of Mobile Simple or its affiliates, subsidiaries or service providers who need to have access to this data in order to be able to fulfill their given duties.

## 8. PERSONAL DATA OF HOTELIERS

You may be interested in inviting other hoteliers to join Mobile Simple. In the event you wish to use Mobile Simple's referral service, you will be directed to a webpage and will have the possibility of adding one or more email addresses in an online form. The information entered in this form, will only be used for the purposes of automatically generating an email message to these potential Mobile Simple users. By entering other hoteliers' email address you are confirming that the hotelier has consented to the supply of their details. Mobile Simple may identify you as the person who has made the referral in the invitation sent to your friend and will include your name, email address and/or phone number in such invitation.

## 9. CONTACTING YOU

Mobile Simple may from time to time ask you to provide information on your experiences which will be used to measure and improve quality. You are at no time under any obligation to provide any of such data. Any and all information which is voluntarily submitted in feedback forms on the website or any survey that you take part in is used for the purposes of reviewing this feedback and improving the Mobile Simple software, and Mobile Simple and other Mobile Simple products and websites.

Mobile Simple may contact you to send you messages about faults and service issues. Further, Mobile Simple reserves the right to use email, the Mobile Simple software or SMS to notify you of any eventual claims related to your use of Mobile Simple software, the Mobile Simple websites and/or Mobile Simple products, including without limitation claims of violation of third party rights.

## 10. HOW CAN YOU ACCESS OR AMEND YOUR PERSONAL DATA?

You have the right to access and, where relevant, to amend your personal information. Some of your information may be viewed or edited online by signing into your account page on [www.Mobile-Simple.com](http://www.Mobile-Simple.com). We will respond to requests to view, correct, complete or remove your personal information within a reasonable period of time and upon verification of your identity.

Mobile Simple will use all reasonable endeavours to accommodate requests to delete personal information unless it is required to be retained by law or for lawful business purposes.

## 11. HOW LONG IS YOUR PERSONAL DATA KEPT BY MOBILE SIMPLE?

Mobile Simple will retain your information for as long as is necessary to: (1) fulfill any of the Purposes (as defined in article 2 of this Privacy Policy) or (2) comply with applicable legislation, regulatory requests and relevant orders from competent courts.

Retention of Instant Messages, Voicemail Messages, and Video Messages (Mobile Simple internet communications software application only)

## 12. CHILDREN

Mobile Simple's websites and software clients are not intended for or designed to attract users under the age of 16. We encourage parents to be involved in the online activities of their children to ensure that no information is collected from a child without parental permission.

## 13. CAN THIS PRIVACY POLICY BE MODIFIED?

Mobile Simple will occasionally update this Privacy Policy to reflect changes in our software and/or products and customer feedback. When we post changes to this Privacy Policy at [Privacy Policy](#) we will update the "last revised" date at the bottom of the Privacy Policy. If there are material changes to this Privacy Policy or in how we will use your personal information, we will notify you either by prominently posting a notice of such changes prior to implementing the change or by directly sending you a notification. You agree that your continued use of the Mobile Simple software or Mobile Simple products after notice shall constitute your acceptance of the Privacy Policy. We encourage you to periodically review this Privacy Policy to be informed of how Mobile Simple is collecting, using, and protecting your information.

## 14. HOW CAN YOU CONTACT MOBILE SIMPLE?

To contact us :  
Tel : +1 800 467 5892 Toll Free  
Tel : + 1 702 998 3675  
Email: [support@Mobile-Simple.com](mailto:support@Mobile-Simple.com)