



Host Privacy Policy

Version: 6 August 2026

Replaces the version dated 20 April 2026

AROYO BRACHA LTD, operating the brand MakeYourTravel

makeyourtravell.com

This Host Privacy Policy explains how AROYO BRACHA LTD, operating the brand MakeYourTravel ("MakeYourTravel", "we", "us"), collects, uses, shares, and protects the personal data of Hosts: the tour operators, guides, drivers, attraction operators, restaurants, spa and beauty providers, photographers, and other businesses that list and sell Services through our platform at makeyourtravell.com (the "Platform").

"Host" means a business that lists Services on the Platform. "Guest" means a traveler who books them. This Policy is about Host data.

"Personal data" means any information relating to an identified or identifiable natural person, as defined by Regulation (EU) 2016/679 ("GDPR"). This Policy applies to individuals acting on behalf of a host, including sole traders, company directors, and employees. Information about a legal entity that cannot be linked to a natural person is not personal data.

Read this Policy together with the MakeYourTravel Host Terms and Conditions, which govern the contractual relationship. This Policy covers your data as a host. It does not cover the personal data of travelers who book your Services, which is addressed in the guest-facing Privacy Policy at makeyourtravell.com/privacy.

1. Who We Are (Data Controller)

The controller for host personal data is:

AROYO BRACHA LTD, trading as MakeYourTravel

Email: hello@makeyourtravell.com

Website: makeyourtravell.com

We have not appointed a Data Protection Officer. We are not required to under Article 37 GDPR, because our core activities do not consist of large-scale regular and systematic monitoring, or large-scale processing of special category data. For any question about this Policy or your personal data, write to the address above and it will reach the person responsible.

2. Personal Data We Collect

2.1 Data you give us during registration

- Full name of the individual representing the host
- Business or trading name
- Business email address
- Phone number, including an emergency contact if different
- Business address, and for a sole trader, primary address
- Bank account details (IBAN, account holder name) for payouts
- Tax identification number, VAT number, and business registration number
- For an individual with no tax identification number, date and place of birth

The last two categories are collected in part to meet our legal reporting obligation described in Section 3.3.

2.2 Data we collect when you use the Host Dashboard

- Login credentials. Passwords are stored hashed. We never store them in plain text.
- IP address, and the approximate location derived from it
- Device information: browser, operating system, screen size
- Session data: pages visited, time spent, clicks and actions on the dashboard

Some of this is strictly necessary to run and secure the dashboard. The rest is analytics, and we collect it only with your consent. See Section 3.5.

2.3 Data generated through ongoing use

- Product Offer content you upload (descriptions, photos, pricing), to the extent it contains personal data such as your name, likeness, or portfolio work
- Messages and communications you send us: email, WhatsApp, and messages sent through the dashboard
- Records of bookings, payouts, commissions, invoices, and tax documents
- Compliance and verification records: licences, permits, professional qualifications, insurance certificates
- Performance data used for ranking under Section 7.1 of the Host Terms: response times, cancellation rate, review scores, completion rate

2.4 Special category data

We do not ask for special category data as defined in Article 9 GDPR. If a compliance document you send us (for example a health or professional certificate) happens to contain health data, we use it only to verify eligibility to provide the Service, and we restrict access to it.

3. Why We Process Your Data, and Our Legal Basis

We process host personal data only where we have a legal basis under Article 6 GDPR.

3.1 To perform our contract with you, Article 6(1)(b)

Setting up and managing your host account, displaying your Services on the Platform, processing bookings, calculating and paying commissions and payouts, and handling cancellations, refunds, and guest support relating to your Services.

3.2 To comply with legal obligations, Article 6(1)(c), general

Bulgarian tax and commercial law requires us to retain financial records (invoices, payment records) for up to ten (10) years. We may also be required to disclose data to tax authorities, regulators, or law enforcement on lawful request.

3.3 To comply with our platform tax reporting obligation, Article 6(1)(c), DAC7

We are a reporting platform operator under Council Directive (EU) 2021/514 ("DAC7"), transposed into Bulgarian law in the Tax and Social Insurance Procedure Code.

This requires us to collect and verify your identifying and tax information, and to report to the **Bulgarian National Revenue Agency (NRA)**, by 31 January each year for the preceding calendar year: your name, address, tax identification number and issuing country, VAT number, business registration number, the financial account identifier used for payouts, the total consideration paid or credited to you per calendar quarter, and the fees, commissions, and taxes we withheld or charged.

The NRA may share this information with the tax authority of the EU member state where you are resident. If you are resident outside the EU, information may still be reported where the relevant activity took place in an EU member state.

We will give you a copy of the information we report about you, at or before the time we file it. We cannot opt you out of this. It is a legal obligation on us, not a choice.

3.4 For our legitimate interests, Article 6(1)(f)

We rely on legitimate interests to:

- (i) prevent fraud and misuse of the Platform;
- (ii) secure our systems and investigate security incidents;
- (iii) rank and present Services on the Platform using the performance data in Section 2.3;
- (iv) send operational information to hosts, such as policy updates, system maintenance, and booking notices;
- (v) enforce the Host Terms and establish, exercise, or defend legal claims.

We balance these interests against your privacy before relying on this basis. You may object at any time under Section 7.6.

3.5 With your consent, Article 6(1)(a)

We rely on consent for:

- **Analytics and performance cookies and similar technologies**, including Google Analytics 4, Hotjar, and the Meta Pixel where it is active on a page you visit. These are not strictly necessary to run the dashboard, so under the Bulgarian Electronic Communications Act, which implements the ePrivacy Directive, we set them only after you consent through our cookie banner.
- **Optional host marketing**, including case studies, testimonials, and use of your name or photograph in our promotional material.

You may withdraw consent at any time, through the cookie settings link in the site footer for cookies, or by writing to us. Withdrawal does not affect the lawfulness of processing carried out before withdrawal, and does not affect strictly necessary cookies, which we set without consent because the dashboard cannot function without them.

4. Third Parties We Share Data With

We share host personal data only with third parties that help us operate the Platform. Each is bound by a data processing agreement and processes data on our instructions, or acts as an independent controller where the law requires it.

4.1 Our booking system

The booking and host management system behind the Platform is **built and operated by MakeYourTravel**. We do not use a third-party booking or channel-management platform. Your product offers, availability, bookings, and commission records are held in our own system, and the only third parties that touch them are the infrastructure providers named in Section 4.2.

4.2 Hosting and infrastructure

Vercel Inc. (United States) hosts the MakeYourTravel website and the Host Dashboard, and stores uploaded media assets.

Render Services, Inc. (United States) hosts our backend application services and databases.

Both receive the data transmitted through and stored by the Platform in the course of hosting it, including host account, product offer, and booking records. Both act as processors on our instructions under a data processing agreement.

4.3 Payment processing

Stripe Payments Europe Ltd. (Ireland) processes guest payments and payouts to hosts, and receives bank account details (IBAN) and payout transaction data. Stripe acts as an independent controller under its own terms and privacy policy for the purposes of payment regulation and fraud prevention.

4.4 Messaging

WhatsApp Ireland Limited, part of Meta, where you communicate with us on WhatsApp. Meta processes your phone number and message metadata under its own terms as an independent controller. Message content is end-to-end encrypted in transit, but the record of the conversation is stored on the device we use to communicate with you. If you prefer not to use WhatsApp, email us instead.

4.5 Business communication and support

Google Ireland Ltd. provides Google Workspace (Gmail, Drive, Calendar). Email between MakeYourTravel and hosts passes through and is stored on Google Workspace. Acts as a processor.

We do not use a third-party helpdesk or ticketing tool. Host support runs on email and WhatsApp, handled directly by our own team.

4.6 Analytics

Google Ireland Ltd. (Google Analytics 4), **Hotjar Ltd. (Malta)**, and **Meta Platforms Ireland Ltd. (Meta Pixel)** collect usage data when you interact with the Platform, for analytics and interface improvement. These set cookies and collect IP address, device information, and session behavior. They are activated only after you consent under Section 3.5. Meta and Hotjar may process data outside the EEA.

4.7 Tax and accounting

Our external accountants and tax advisors in Bulgaria, and the **Bulgarian National Revenue Agency (NRA)**, including under DAC7 as described in Section 3.3. Shared only to the minimum extent necessary. The NRA acts as an independent controller.

4.8 Legal and regulatory

We may disclose personal data to public authorities, courts, or law enforcement where required by law or court order, or to protect our legal rights.

4.9 Business transfers

If MakeYourTravel is merged, acquired, or sells substantially all its assets, host data may transfer as part of that transaction. We will notify hosts before such a transfer takes effect.

4.10 What we do not do

We do not sell host personal data. We do not share it with other hosts. We do not use it to train third-party AI models, and we do not permit our processors to do so.

5. International Data Transfers

Some service providers are located outside the European Economic Area, or may transfer data outside it:

- **Vercel** and **Render** host and process data in the United States and in regional data centers.
- **Stripe**, **Google** (Analytics and Workspace), **Meta** (Pixel and WhatsApp), and **Hotjar** may transfer data to the United States or other non-EEA countries.

Where personal data is transferred outside the EEA, we rely on the safeguards required by Chapter V GDPR, including the European Commission's Standard Contractual Clauses and, where applicable, the EU-U.S. Data Privacy Framework.

You may request copies of the applicable safeguards by writing to hello@makeyourtravell.com.

6. How Long We Keep Your Data

Data	Retention period
Active account data	For the duration of your host relationship
Financial records: invoices, commission statements, payout records, tax documents	10 years after the end of the fiscal year in which they were issued, as required by Bulgarian tax and commercial law
DAC7 reporting records	10 years, aligned with the record-keeping obligation under the Tax and Social Insurance Procedure Code
Compliance and verification documents: licences, insurance, qualifications	Duration of the relationship, plus 3 years, so we can evidence that we verified you at the time
Support and communication history, including WhatsApp	3 years after the last interaction
Dashboard session and analytics data	Up to 14 months, the GA4 default, or shorter where configured
Booking history accessible to you in the dashboard	Accessible to you for 90 days after termination, per Section 16.5 of the Host Terms. Retained by us under the financial records period above
Marketing and consent records	Until consent is withdrawn, plus a reasonable period to demonstrate compliance

After the applicable period we delete or anonymize the data.

7. Your Rights

Under GDPR you have the following rights in respect of your personal data.

7.1 Right of access

You may request a copy of the personal data we hold about you and information about how we use it.

7.2 Right to rectification

You may ask us to correct inaccurate or incomplete data. You can update most of it directly in the Host Dashboard.

7.3 Right to erasure

You may ask us to delete your personal data. This right is not absolute. We may retain data where we are legally required to, for example financial and DAC7 records, or where we need it to establish, exercise, or defend legal claims.

7.4 Right to restrict processing

You may ask us to limit processing in certain situations, for example while we verify a correction request.

7.5 Right to data portability

You may request the data you provided to us in a structured, commonly used, machine-readable format, and ask us to transfer it to another controller where technically feasible. Your booking and payout records are also exportable directly from the Host Dashboard.

7.6 Right to object

You may object to processing based on our legitimate interests, including the use of performance data for ranking. You may object at any time to any use of your data for direct marketing, and we will stop.

7.7 Right to withdraw consent

Where we rely on consent, you may withdraw it at any time. Withdrawal does not affect processing carried out before withdrawal.

7.8 How to exercise your rights

Write to hello@makeyourtravell.com. We respond within one (1) month of receipt. If the request is complex we may extend by up to two (2) further months, and we will tell you within the first month if we do. We may ask for reasonable proof of identity first. Exercising your rights is free, unless a request is manifestly unfounded or excessive.

7.9 Right to lodge a complaint

If you believe we have not handled your data in accordance with GDPR, you may complain to the Bulgarian Commission for Personal Data Protection (Комисия за защита на личните данни, CPDP) at www.cdpd.bg, or to the supervisory authority in your country of residence.

8. Security

We use appropriate technical and organizational measures to protect host personal data, including encryption in transit (TLS), hashed passwords, role-based access controls, and regular review of our security practices. No system is completely secure.

If we become aware of a personal data breach affecting host data, we will notify the CPDP within 72 hours where required by Article 33 GDPR, and will notify you without undue delay where the breach is likely to result in a high risk to your rights and freedoms.

You are responsible for keeping your dashboard login credentials confidential, and for telling us immediately if you suspect unauthorized access.

9. Automated Decision-Making

We do not make decisions producing legal or similarly significant effects about you based solely on automated processing.

The ranking of Services on the Platform is partly automated and uses the performance data described in Section 2.3. Ranking affects visibility, not your legal rights or your ability to trade, and the parameters are published in Section 7.1 of the Host Terms. Decisions to restrict, suspend, or terminate a host are always reviewed by a person

before they take effect, except where an automated fraud or safety control triggers an immediate hold, in which case a person reviews it promptly afterward and you receive a statement of reasons.

10. Changes to This Policy

We may update this Policy to reflect changes in our practices or the law. We will notify hosts of material changes at least thirty (30) days before they take effect, by email to the address registered in the host account. Continued use of the Platform after the effective date constitutes acknowledgment of the updated Policy. Where a change requires your consent, we will ask for it separately.

11. Contact

Questions, requests, or complaints about this Privacy Policy:

Email: hello@makeyourtravell.com

AROYO BRACHA LTD, operating the brand MakeYourTravel

Website: makeyourtravell.com

Bulgarian supervisory authority:

Commission for Personal Data Protection (CPDP)

2 Prof. Tsvetan Lazarov Blvd., 1592 Sofia, Bulgaria

www.cdpd.bg



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