GUESLIST Customer Privacy Policy

Last Updated: August 22nd, 2025

This Privacy Policy describes how GUESLIST ("we," "us," or "our") collects, uses, and discloses your information when you use our mobile application(s) and/or web platform(s) (the "Platform"). This Platform is designed for our customers/users in Indonesia and potentially international users.

By using the Platform, you agree to the collection and use of information in accordance with this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not use the Platform.

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1. Definitions

a. **Account**: A unique account created for you to access our Platform or parts of our Platform.
b. **Company**: (referred to as either "the Company," "We," "Us," or "Our" in this Agreement) refers to PT New Directions Success, Jl. Sunset Road No. 89, Ruko Sunset Indah I Kav 1, Lingkungan Abian Base, Desa/Kel. Kuta, Kec. Kuta, Kab. Badung, Provinsi Bali 80361, Indonesia.
c. **Client(s)/Partner(s)**: Third-party providers (e.g., accommodations, tour operators, restaurants, activity providers, transportation services, wellness providers, rental services, experience organizers, etc.) that offer Services and Deals through the Company's Platform.
d. **Device**: Any device that can access the Platform such as a computer, a cellphone, or a digital tablet.
e. **Personal Data**: Any information that relates to an identified or identifiable individual, as defined by Indonesian Law No. 27 of 2022 on Personal Data Protection (UU PDP).
f. **Platform**: Refers to the GUESLIST mobile application(s) and/or web platform(s).
g. **Service Provider**: Any natural or legal person who processes data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Platform, to provide the Platform on behalf of the Company, to perform services related to the Platform, or to assist the Company in analyzing how the Platform is used.
h. **Services**: The wide range of offerings made available to Users through the Company's App and web platform(s) by Clients/Partners, including but not limited to accommodations, travel experiences, activities, tours, transportation rentals (e.g., bikes, cars, helicopters), wellness services (e.g., massage, barber, tattoo), personal services (e.g., laundry), and various other local products and experiences (e.g., silver making, cooking classes, surfing lessons).
i. **Usage Data**: Data collected automatically, either generated by the use of the Platform or from the Platform infrastructure itself (for example, the duration of a page visit).

j. **You**: The individual accessing or using the Platform (i.e., our customer/user), or the company, or other legal entity on behalf of which such individual is accessing or using the Platform, as applicable.

2. Information We Collect

We collect various types of information from and about you to provide and improve our Platform and Services.

2.1 Personal Information

While using our Platform, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you, or is necessary for making Bookings and using our Services. Personally identifiable information may include, but is not limited to:

a. **Biographical Information & Identifiers**: Email address, First name and last name, Phone number, Address, Province, City, ZIP/Postal code.
b. **Contact Information**: Mobile phone number, secondary email address.
c. **Booking Information**: Details of Services and Deals booked through the Platform, including dates, times, Client/Partner names, special requests, and participant information.
d. **Payment Information**: Credit/debit card details (card number, expiration date, CVV), digital wallet information, bank account details (for refunds or specific payment methods), and billing address. **Note: Full payment card details are typically processed by secure third-party payment gateways and are not stored directly by GUESLIST.**
e. **Preferences and Interests**: Information about your preferences for Services, Deals, activities, and other interests to personalize your experience.
f. **Identity Verification Documents**: In limited cases, for high-value bookings or fraud prevention, scanned copies of your KTP (Indonesian Identity Card) or other official identification documents may be requested.
g. **Any other specific personal data voluntarily disclosed by you or required for the provision of the Platform and Services.**

2.2 Usage Data

Usage Data is collected automatically when using the Platform. This data helps us understand how our users interact with the application, troubleshoot issues, and improve functionality.

Usage Data may include information such as:

a. Your Device's Internet Protocol address (IP address).
b. Browser type and browser version.
c. The pages of our Platform that you visit, the time and date of your visit, and the time spent on those pages.
d. Unique device identifiers and other diagnostic data.
e. Information on your activities within the Platform, such as searches for Services, Deals viewed or booked, and features used.
f. When you access the Platform by or through a mobile device, we may collect specific information like the type of mobile device, your mobile device's unique ID, your mobile operating system, and the type of mobile Internet browser you use.

2.3 Location Information

We may collect and process information about your location when you use our Platform, especially when you enable location services on your device. This data is used to:

a. Provide location-based services, such as showing you nearby Services or Deals.
b. Improve the relevance of search results and recommendations.
c. Enhance security and fraud prevention.

You can enable or disable location services through your Device settings. If you disable location services, some features of the Platform may not function optimally.

2.4 Sensitive Personal Information

In limited circumstances, we may collect information that could be considered "sensitive personal information" under Indonesian law or international standards. This may include, for example, health-related information if you disclose specific accessibility needs for a Service, or biometric data if used for advanced identity verification. We will only collect such information with your explicit consent and strictly for the purposes for which it was provided, and in accordance with applicable laws.

3. How We Use Your Information

The Company may use Personal Data for the following purposes, based on the legal grounds outlined below:

a. **To provide and maintain our Platform and Services**: Including to monitor the usage of our Platform and ensure its functionality. This is necessary to fulfill our obligations under the Terms & Conditions with You.
b. **To manage Your Account**: To manage your registration as a user of the Platform

and provide You access to different functionalities available to You as a registered user.

c. **For the performance of a contract**: To process and facilitate your Bookings with Clients/Partners, manage payments, and provide booking confirmations and related communications.
d. **To contact You**: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as mobile application's push notifications regarding updates, informative communications related to the functionalities, products, or contracted services, including security updates, when necessary or reasonable for their implementation. We may also contact You for support or to address your inquiries based on our legitimate interest in providing effective customer service.
e. **To provide You with news, special offers, and general information**: About other goods, services, and events which we offer that are similar to those that You have already purchased or enquired about, unless You have opted not to receive such information. We will obtain your explicit consent for marketing communications where required by law.
f. **To manage Your requests**: To attend and manage your requests to us, ensuring timely and effective support.
g. **For business transfers**: We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about our Platform users is among the assets transferred. This is based on our legitimate interest in business continuity and may be required by law.
h. **For other purposes**: We may use your information for data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Platform, Services, and your experience. This is based on our legitimate interest in improving our offerings and understanding our user base.
i. **Personalization for Users**: To personalize your experience within the Platform, suggest relevant Services and Deals based on your preferences and booking history, and tailor recommendations that may be of interest to you. This enhances your user experience and helps optimize our business.
j. **Fraud Prevention**: To prevent, investigate, and detect fraudulent or prohibited activities within the Platform, including monitoring for suspicious booking patterns or payment attempts, and to comply with legal obligations regarding fraud detection.

Automated Decision-Making/Artificial Intelligence:

We may use automated systems or artificial intelligence (AI) to enhance your experience, optimize recommendations, or detect potential fraud within the Platform (e.g., for personalized service suggestions, dynamic pricing, or fraud detection). If any automated decision-making has a significant effect on you, we will disclose the logic involved and inform you of your right to contest such decisions or request human review, where applicable by law.

4. Sharing Your Information

We may share your personal information in the following situations, ensuring that such sharing adheres to applicable laws, including Indonesian UU PDP.

4.1 With Service Providers

We may share your Personal Data with Service Providers to monitor and analyze the use of our Platform, to process payments, or to contact you. Examples include hosting providers, analytics providers, email marketing services, and cloud storage providers. These service providers are contractually bound to protect your data and use it only for the purposes for which we disclose it to them.

4.2 With Clients/Partners

We will share your Personal Data with the relevant Client(s)/Partner(s) when you make a Booking for their Services through our Platform. This is necessary to facilitate your Booking and ensure the Client/Partner can provide the requested Service. The information shared may include your name, contact details, booking specifics, and any special requests. Clients/Partners are independently responsible for their own data processing practices in accordance with their respective privacy policies.

4.3 For Business Transfers

We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company. In such cases, your Personal Data would be among the assets transferred.

4.4 With Affiliates

We may share your information with our parent company and any other subsidiaries, joint venture partners, or other companies that we control or that are under common control with us. This sharing facilitates centralized operations, product development, personalized services, security, and fraud prevention across our corporate group. We will require those affiliates to honor this Privacy Policy and applicable data protection

laws.

4.5 With Business Partners

We may share your information with our business partners to offer you certain products, services, or promotions that are relevant to your use of the Platform or to facilitate joint marketing efforts. This sharing is typically governed by agreements that require partners to protect your personal information.

4.6 For Legal Reasons

We may disclose your Personal Data in the good faith belief that such action is necessary to:

a. Comply with a legal obligation, including responding to legitimate requests from Indonesian governmental authorities, law enforcement, or regulatory bodies.
b. Protect and defend the rights or property of the Company.
c. Prevent or investigate possible wrongdoing in connection with the Platform.
d. Protect the personal safety of Users of the Platform or the public.
e. Protect against legal liability.

"Sale" or "Share" Disclosure: We do not "sell" or "share" the personal data of our users for monetary or other valuable consideration, nor for cross-context behavioral advertising purposes, as those terms may be broadly defined under certain international privacy laws. Any sharing of data is for the purposes explicitly stated in this policy to provide and improve our Platform and Services, facilitate bookings, and comply with legal obligations.

5. Cookies and Similar Technologies

We want your access to our Platform to be as easy, efficient, and useful as possible. To help us do this, we use cookies, pixels, SDKs, and similar tracking technologies to improve your experience, to enhance Platform security, and to analyze how our Platform is used.

a. **What they are**: Cookies are small text files automatically placed on your Device when you visit almost any website. Pixels and SDKs are similar technologies used in mobile applications to track usage and integrate third-party services.
b. **Purpose**: These technologies help us to:
    i. Remember your login details, so you don't have to re-enter them repeatedly.
    ii. Track your activities within the Platform (e.g., searches, viewed Deals, booked Services).

iii. Perform analytics to understand Platform usage patterns and identify areas for improvement.
iv. Enhance the security and performance of the Platform.
v. Personalize your experience by suggesting relevant content or tools.

c. **Your Choices**: You can manage cookies through the settings of your internet browser. For mobile applications, you may manage certain tracking functionalities through your device's privacy settings. Please note that if you decline or disable certain cookies or tracking technologies, your access to some functionality and areas of our Platform might be degraded or restricted.

Our use of any information we collect through cookies and similar technologies is subject to this Privacy Policy.

6. Retention of Your Information

The Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable Indonesian laws, such as tax regulations), resolve disputes, and enforce our legal agreements and policies.

The criteria that we use to determine our retention periods include:

a. The duration of our business relationship with you as a user, including any open accounts or active Bookings.
b. Whether we have a legal obligation related to your personal information, such as laws requiring us to keep records of your transactions or communications with us (e.g., for tax or regulatory reporting purposes in Indonesia).
c. Whether there are any current and relevant legal obligations affecting how long we will keep your personal information, including contractual obligations, litigation holds, statutes of limitations, and regulatory investigations.

Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of Our Platform, or We are legally obligated to retain this data for longer time periods.

7. Transfer of Your Information

Your information, including Personal Data, is processed at the Company's operating

offices in Indonesia and in any other places where the parties involved in the processing are located. This means that your information may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those in Indonesia.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and Indonesian Law No. 27 of 2022 on Personal Data Protection (UU PDP). No transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place, including the security of your data and other personal information, to ensure a comparable level of protection. We implement appropriate contractual clauses and safeguards to ensure your data remains protected during international transfers.

8. Security of Your Information

The security of your Personal Data is important to us. We implement and maintain reasonable administrative, technical, and physical safeguards designed to protect against unauthorized access, use, modification, and disclosure of your personal information that we have in our custody and control. These measures include encryption when transmitting your information, firewalls, and access controls.

However, remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. We have put in place adequate procedures to deal with any actual or suspected personal information breach and will notify you and any applicable regulator of any data breach where we are legally required to do so under Indonesian law.

9. Your Privacy Rights

As an individual whose Personal Data we process, you have certain rights under Indonesian Law No. 27 of 2022 on Personal Data Protection (UU PDP). Depending on your jurisdiction and subject to certain exceptions prescribed by law, you may have the following rights regarding your Personal Data:

9.1 Access and Correction

You have the right to request access to the Personal Data we hold about you and to request that we correct any inaccurate, incomplete, or out-of-date Personal Data.

9.2 Deletion

You have the right to request the deletion of your Personal Data, subject to certain exceptions (e.g., legal obligations to retain data, active contract performance, or to establish, exercise, or defend legal claims).

9.3 Opt-Out

You may opt-out of receiving promotional communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us directly.

9.4 Right to Object

You have the right to object to the processing of your Personal Data, particularly where the processing is based on our legitimate interests and your interests or fundamental rights and freedoms override those interests. We will comply with your request unless we have compelling legitimate grounds for the processing or need to continue processing for legal claims.

9.5 Right to Restrict Processing

You have the right to request the restriction of processing your Personal Data under certain circumstances, such as when the accuracy of the data is contested, the processing is unlawful, or we no longer need the data for the original purpose but you require it for legal claims.

9.6 Right to Data Portability

You have the right to receive your Personal Data in a structured, commonly used, and machine-readable format and to transmit that data to another controller, where the processing is based on consent or contract, and is carried out by automated means.

9.7 Right to Lodge a Complaint

You have the right to lodge a complaint with the relevant data protection authority in Indonesia (if established and active for such matters) if you believe your privacy rights have been violated. We encourage you to contact us first so we can address your concerns.

Process for Exercising Rights: To exercise any of these rights, please contact us via the methods described in the "Contact Us / Privacy Officer" section below. We may need to request specific information from you to help us confirm your identity and ensure your right to exercise these rights. These are security measures to ensure that personal information is not disclosed to any person who has no right to receive it. We will respond to all legitimate requests in accordance with applicable laws.

Non-Discrimination: We value your privacy and will not discriminate against you for exercising your privacy rights.

10. Children's Privacy

Our Platform is not intended for children, specifically individuals under the age of 18 (or the age of legal majority in Indonesia). We do not knowingly collect personally identifiable information from anyone under this age. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

11. Changes to This Privacy Policy

We may update our Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, and other factors. We will notify you of any material changes by posting the new Privacy Policy on this page. We will also let you know via email and/or a prominent notice on our Platform, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

12. Contact Us / Privacy Officer

If you have any questions about this Privacy Policy, wish to exercise any of your privacy

rights, or have any concerns regarding our data processing practices, you can contact our Privacy Officer:

Privacy Officer
PT New Directions Success
Jl. Sunset Road No. 89, Ruko Sunset Indah I Kav 1, Lingkungan Abian Base, Desa/Kel. Kuta, Kec. Kuta, Kab. Badung, Provinsi Bali 80361
By email: info@gueslist.com
By visiting this page on our website: www.gueslist.com/contact-us
We are committed to addressing your concerns and protecting your privacy in accordance with Indonesian Law No. 27 of 2022 on Personal Data Protection (UU PDP).

13. Governing Law

This Privacy Policy shall be governed by and construed in accordance with the laws of the Republic of Indonesia, specifically including Indonesian Law No. 27 of 2022 on Personal Data Protection (UU PDP), without regard to its conflict of law provisions.

Any disputes arising from or relating to this Privacy Policy will be subject to the exclusive jurisdiction of the courts of Indonesia.