

# Spasli Privacy Policy

## Introduction

**Welcome to Spasli!** By accessing or using Spasli's website and services (the "Platform"), you acknowledge that you have read, understand, and agree to be bound by these Terms of Privacy (the "Terms") and our accompanying Privacy Policy. These Terms constitute a binding legal agreement between you ("User") and Spasli ("the Company," "we," "us," or "our"). If you **do not agree** with any of these Terms or the Privacy Policy, you **must not use** the Platform. Use of the Platform in any manner signifies your acceptance of this Agreement.

This Privacy Policy describes how Spasli collects, uses, shares, and protects personal information from users of our Platform (web and mobile web). It is designed to comply with applicable privacy laws and regulations in the United States (including California Online Privacy Protection Act (**CalOPPA**) and the Children's Online Privacy Protection Act (**COPPA**) and to follow **FTC guidance** on privacy practices for online services. We are committed to protecting your privacy and being transparent about our data practices.

## Scope of Policy

This Privacy Policy applies to information we collect on the Spasli website and through any mobile or web-based applications that link to this Policy (collectively, the "Platform"). It covers personal information collected from users in the United States. It does not apply to any third-party websites or services that you may access through our Platform. By using Spasli, you agree to the data practices described in this Policy.

## Information We Collect

We collect "**Personal Information**" that can identify you, as well as data that does not directly identify you but is related to you. The categories of personal information we collect include:

**Information You Provide Directly:** When you create an account or use Spasli, you provide information such as:

- **Contact Data:** your name, email address, phone number, date of birth, identification, and physical address.
- **Account Credentials:** username or phone number, and password (encrypted).
- **Profile Information:** optional details like a profile photo or bio, and if you link a third-party account (Google, Facebook, etc.) via SSO, we receive information like your name, email, and profile picture from that account with your permission.
- **Item Listings:** details and images of items you list for rent, including any descriptions or pricing you input (these may contain personal information, for example if you include your location or contact info in a listing – although we advise against putting private info in public descriptions).
- **Communications:** messages you send through our Platform to other users (we collect and store these to deliver messages and for safety monitoring) and any feedback or support inquiries you send to us.

**Information We Collect Automatically:** When you use Spasli, we automatically collect certain information about your device and usage of the Platform:

- **Device/Usage Data:** IP address; device identifiers; browser type; operating system; referring/exiting pages; dates/times of access; and actions taken on the site (e.g. pages viewed, clicks, search queries).
- **Cookies & Similar Tech:** We use cookies, web beacons, and similar tracking technologies to remember your preferences, keep you logged in, and collect information about how you interact with our site. (See “**Cookies and Tracking**” below for details.)
- **Geo-location Data:** If you allow it (for example, via your web browser settings), we may collect approximate location information from your IP or more precise location if you grant permission. This helps to show you nearby items. You can disable location access at any time.

- **Information from Third Parties:** We may receive information from third-party sources to help us verify users or prevent fraud. For example, we might use a phone verification service to confirm your phone number, or collect identity verification information via a service (like a check of your ID or credit header information) if we implement “Verified” badges. Also, if you engage with Spasli on social media (e.g., liking our page), those platforms might send us aggregate info (subject to their privacy settings).
- **Financial Information:** *Currently, Spasli does not collect or process payment card information, as all rental payments are handled directly between users off-platform. We do not ask you for credit card numbers or bank information for transactions. (If in the future Spasli enables in-app payments, this Policy will be updated accordingly and will specify what financial data is collected and how it’s used.)*

## How We Use Your Information

We use the collected information for the following **business and operational purposes** (and **we do not** use your personal data for any purpose that is incompatible with these):

- **To Provide and Maintain the Service:** We use personal info to create and manage your account, enable user-to-user communications (so Owners and Renters can arrange rentals), process any account-related actions, and display listings. For example, we use your address or location to show you items nearby and to show your approximate location to potential renters.
- **To Facilitate Rentals and User Interactions:** We might use your phone number or email to send verification codes, transaction alerts, or to connect Owners and Renters when a rental is agreed (for instance, once you agree to rent an item, we may share your phone number with the other party so you can coordinate pickup, unless you opt to willingly alter the message and remove them). We use communications data to deliver your messages and might review communications if needed for trust & safety (for example, to investigate fraud or abuse reports).
- **Safety and Trust:** We may use personal information to **verify identities and prevent fraud**. For example, we could use your submitted ID or information to confirm you are 18+ and to detect fraudulent activity (consistent with our Terms

requiring accurate information). We also use data to monitor for scams or prohibited content and to enforce our Terms of Service.

- **Improvement and Analytics:** We use usage and device data to understand how our Platform is used, to troubleshoot technical issues, and to improve features. For instance, we might analyze what categories of items are most popular or identify usability problems in the website. We may also use cookies to remember your preferences (such as language or filter settings) and provide a more personalized experience.
- **Communications:** We use your contact information to send transactional communications: confirmations, reminders, updates about rentals, security alerts (like unusual login attempts), and changes to our terms or policies. We may also send you **promotional emails** about new features or offers, but you can opt-out of marketing communications at any time. (Transactional/service emails, like a rental confirmation or important account notice, may still be sent as needed.)
- **Legal Compliance and Protection:** We may use or disclose information as we believe necessary or appropriate to comply with applicable laws, regulations, lawful requests and legal process (such as to respond to subpoenas or court orders). We also use data to **enforce our Terms of Service** or agreements, to detect or investigate illegal activities (such as fraud or theft of items), and to **protect the rights, property, or safety** of Spasli, our users, or others. For example, if we receive a credible report that a user is under 18 or engaging in dangerous behavior, we might use their information to investigate and take action, and potentially report to authorities.

We **do not sell** your personal information to third parties for their own marketing purposes, and we do not use or share sensitive personal information except as needed to provide the service (for instance, we're not using any racial/ethnic, health, or similar sensitive data about you, and we wouldn't have such data unless you voluntarily provide it in the Platform).

## How We Share Your Information

Spasli is a peer-to-peer platform, so some information sharing is inherent in the service (e.g., showing a listing to other users). We share personal information only in the ways described below, and **we carefully limit** what is shared:

- **With Other Users (Peer-to-Peer Disclosure):** When you engage in a rental, certain information will be shared with the other party **to facilitate the transaction**. For example, if a Renter requests to rent your item, you as the Owner will see the Renter's first name, last name, general location, and any profile information they have made available. If you are assigned the rental, the Renter will see your first name, contact phone number (if you've provided one for rentals), email address, and the pickup address or meet-up location you provide. We try to limit what contact info is revealed by default – for instance, prior to a confirmed rental, users primarily communicate through the Platform's messaging system, limiting shared information. Once a rental is processed through assignments, we may exchange phone numbers or other contact details between the Owner and Renter to ensure you can coordinate hand-offs. **We do not publicly display your full address or phone number** on the site, unless opted by the users; those are only shared with another user when necessary (e.g., for a confirmed transaction).
- **Service Providers:** We use trusted third-party companies to help us operate and improve Spasli. These **service providers** perform functions on our behalf and under our instructions, and they are contractually obligated to protect your information. For example:
  - We may use a cloud hosting provider (like AWS or similar) to store data and run our servers.
  - We use email/SMS delivery services to send verification codes or notifications (for instance, an SMS API to send a phone verification text, which necessitates sharing your phone number with that service for the one-time use).
  - If we implement identity verification or fraud prevention tools, we might share some info (like your ID or name) with a verification service (e.g., services like Onfido or Plaid identity check) solely to confirm your identity or prevent fraud.
  - We could use analytics services (like Google Analytics) to understand usage; these services would collect usage data from your browser through their own scripts/cookies on our site. (We would configure such services not to collect unnecessary data, and they are prohibited from using the data for their own purposes.)

- In all cases, we **only share the minimum information necessary** with these providers for them to perform their work, and they are not allowed to use your data for any purpose other than providing services to Spasli.
- **Legal and Safety Disclosures:** We may disclose information to third parties (such as courts, law enforcement, or government agencies) if we believe disclosure is **required by law or legal process**, or if we reasonably deem it necessary to (a) enforce our Terms of Service, (b) investigate and defend ourselves against any third-party claims or allegations, (c) protect the security or integrity of our Platform, or (d) protect the rights, property, or safety of Spasli, our users, or others. For instance, if a law enforcement agency properly requests user data for an investigation, we may provide it as required by law. Or, if a user is involved in a dispute or injury, we might provide relevant info to assist with legal proceedings, consistent with privacy laws.
- **Business Transfers:** If Spasli is involved in a **merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider**, your information may be transferred as part of that transaction. We would require any new owner or successor entity to honor the terms of this Privacy Policy or give you notice and choice if the data will be used in a materially different way.
- **With Your Consent:** We may share your information in other ways if you **ask us to or explicitly consent**. For example, if we want to feature your success story or item listing in marketing material, we would ask for your permission before using your name or photo or you would willingly post such contents when prompted – where those would be subject to review, acceptance or deletion.
- **Aggregated or De-Identified Data:** We may also share information that has been aggregated (combined with other data so it no longer identifies you personally) or de-identified (stripped of personal identifiers) for research, marketing, analytics, or other purposes. For instance, we might publish trends about item rentals in Atlanta vs. Seattle without any personal information included.

Importantly, we **do not sell personal information** to third-party marketers. We also do not share personal information with third parties for their direct marketing purposes unless you give us consent. If in the future Spasli were to consider selling personal data, we would implement a “**Do Not Sell My Info**” opt-out in accordance with applicable laws – but as of now, **we simply don’t do this**.

## Cookies and Tracking Technologies

We and our service providers use **cookies** and similar tracking technologies to operate and provide our online services. Cookies are small text files placed on your device that help us recognize you and remember your preferences. For example, we use cookies to keep you logged in as you navigate between pages, and to remember your language or other settings. We also use cookies and tracking scripts for analytics, so we can understand user traffic and behaviors on our site.

### Types of Cookies we use:

- **Essential Cookies:** These are necessary for the Platform's functionality. For instance, they enable you to log in and stay logged in, or they enable basic features like shopping cart or session management. Without these, the service may not work properly.
- **Preference Cookies:** These remember your choices (e.g., your preferred sort order, or that you've dismissed a notification) to personalize your experience.
- **Analytics Cookies:** We use these to collect information about how users interact with our Platform, which pages are visited, and other usage statistics. We may use third-party analytics tools like Google Analytics which set their own cookies to help us analyze site traffic and improve our services. The information collected typically includes things like your IP address, browser, pages visited, and time spent – but **it does not identify you by name**. This helps us compile aggregate statistics (e.g., total number of visitors, popular pages).
- **(If applicable) Advertising Cookies:** *Currently, Spasli does not host third-party ads on our Platform, so we do not use advertising cookies or trackers.* If that changes, we will update this policy and provide opt-out options.

**Do Not Track:** Some web browsers offer a "Do Not Track" (DNT) signal or setting that you can enable to indicate your privacy preference not to have data about your online activities tracked across websites. **Currently, Spasli does not respond to browser "Do Not Track" signals**, because there is not yet a consensus on how to interpret DNT signals and no industry standard for responding. We treat all users' data according to this Privacy Policy, regardless of a DNT signal. However, we respect your privacy and provide other ways to opt-out of certain tracking (see **Your Choices** below, e.g., you can opt-out of Google Analytics tracking with their opt-out browser add-on). We will update this section if our policy on DNT changes in the future.

**Third-Party Tracking and Analytics:** As noted, we allow certain third parties like Google Analytics to set cookies or similar tech on our site for analytics purposes. These third parties may collect information about your online activities over time and across different websites when you use our Platform. *For example, Google Analytics might collect data on Spasli and also know you visited other sites that use Google Analytics.* We use this information to improve our service. These third parties are not allowed to use the personal information collected for their own unrelated purposes, but they may combine information collected on Spasli with other information they have independently collected. You can often opt out of data collection or use by these analytics providers – for instance, Google provides a browser add-on: **Google Analytics Opt-out Browser Add-on**, which you can install to prevent analytics on any site from using your data in Google Analytics.

**Managing Cookies:** You have choices about cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies or alert you when a cookie is being placed. However, if you disable or refuse cookies, some parts of the Platform (like staying logged in or other essential features) may become inaccessible or not function properly.

## Data Security

Spasli takes **reasonable measures** to protect your personal information from loss, theft, misuse, and unauthorized access, disclosure, alteration, or destruction. We also restrict access to personal data to authorized employees or contractors who need it to operate our service, and they are bound by confidentiality obligations.

However, please note that **no website or Internet transmission is completely secure**. We cannot guarantee that unauthorized access, hacking, or data breaches will never occur. You **use the Platform at your own risk**, and you are responsible for maintaining the security of your account credentials (for example, choosing a strong password and keeping it confidential). If you believe your Spasli account has been compromised, please contact us immediately.

In the event of a **data breach** that affects your personal information, we will notify you and the appropriate authorities as required by law.

## Data Retention

We retain your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, **unless a longer retention period is required or permitted by law**. For example, as long as you have an account with us, we will keep your profile information and listings so that the service functions. If you delete your account, we will remove or anonymize personal information associated with your account within a reasonable period, except to the extent we need to keep it for legitimate business interests or legal reasons.

Specifically:

- Account information is kept until you delete the account (after which we will securely delete or anonymize it, typically within 30 days, barring unforeseen technical delays). You may do that by requesting in our Support Page.
- Transaction data (like records of rentals or communications) may be retained for a period even after account deletion, in case of disputes, chargebacks, for audit or fraud prevention, or to comply with legal obligations. We will store such data in a safe manner and only as long as necessary.
- Listings or public posts you made may remain visible in backup files or if they were copied by other users, but we will make them inaccessible on the live Platform after account deletion.
- We may retain data as needed to enforce our agreements or comply with law (for example, records of any ban for violating terms, or information needed for tax reporting or legal compliance will be kept as required).

When we no longer have a legitimate need to retain your information, we will dispose of it securely or anonymize it so it can no longer be associated with you.

## Your Rights and Choices

You have certain rights and choices regarding your personal information. We endeavor to allow you to access, correct, or delete your information, and to control how it's used.

- **Access and Update:** You can access and update much of your account information by logging into your Spasli account and editing your profile or settings. For example, you can change your contact information, password, and preferences. Please keep your information up-to-date, as it helps us serve you

better. If any information we have is inaccurate, you can correct it through your account or by contacting us.

- **Account Deletion:** If you wish to **delete your account**, you may do so through the Support Page or by doing so through internal resources that may be provided in the future. Upon your request, we will delete or anonymize your personal information so that you can no longer be identified, except for information that we are required to retain for legal or legitimate business purposes. (Note: Removal of your content from the live Platform does not ensure complete or comprehensive removal from our systems – for instance, data may remain in backups for a short period or as required by law, but we will not use it for any active purpose.)
- **Opt-Out of Marketing:** If you receive promotional emails from us and no longer wish to, you can unsubscribe at any time by clicking the “unsubscribe” link in those emails or by adjusting your account email preferences. Please note that even if you opt-out of marketing messages, we will still send you transactional or service-related communications (such as rental confirmations, security alerts, or policy updates) as these are not promotional.
- **Do Not Track & Ad Choices:** As noted earlier, we currently do not honor DNT signals in a unique way. However, you can manage cookie preferences through your browser settings. For third-party analytics like Google, you can opt-out as described in the Cookies section. Because we do not use third-party advertising, there’s no behaviorally targeted advertising to opt out of on Spasli at this time.
- **California Privacy Rights:** (For California residents) While Spasli is not currently a business that meets the thresholds to be subject to the California Consumer Privacy Act (CCPA) in full, we are committed to the core principles. We do not sell your data (so no “Do Not Sell” link is required). If you are a California resident, under “**Shine the Light**” law (Cal. Civ. Code § 1798.83) you may request a notice disclosing what categories of personal information we have shared with third parties for direct marketing purposes, if any. As we do not share personal information for direct marketing without consent, our response would reflect that. Nonetheless, you can contact us to inquire about your information or any privacy concerns.
- **EU/International Users:** *Spasli is intended for U.S. users only.* We do not currently offer services to the EU or other regions with GDPR or similar laws. If you are using Spasli from outside the U.S., be aware that your information is

collected and stored in the U.S. under U.S. law. If we ever expand internationally, we will update our practices to comply with relevant data protection laws.

- **Exercise of Rights:** To exercise any applicable rights (access, deletion, etc.), please contact us at the **Support Page**. We may need to verify your identity (for example, by confirming control of your email address or other information) before fulfilling your request. We will respond to legitimate requests within the timeframe required by law (for instance, within 45 days for certain requests under California law, if applicable, and can extend once by an additional 45 days if necessary with notice to you).

## Children's Privacy

As noted in our Terms of Service, **Spasli is not intended for anyone under the age of 18**, and we do not knowingly collect personal information from children under 13 years of age. Our Platform is a general audience service and is not directed at children. In fact, users under 18 are not permitted to use Spasli at all.

**COPPA Compliance:** We comply with the Children's Online Privacy Protection Act (COPPA), which requires parental consent for the online collection of personal information from children under 13. We do not knowingly solicit or collect any information from children under 13. If you are under 13, **do not use or attempt to register** on Spasli. If we learn we have inadvertently collected personal information from a child under 13, we will delete that information as quickly as possible. Parents who believe we might have any information from or about a child under 13 should contact us immediately at the Support Page so that we can promptly investigate and remove the data.

While COPPA's protections apply specifically to children under 13, we also understand the importance of protecting the privacy of minors under 18. We do not allow minors (under 18) on our Platform, and thus we aim to avoid collecting data from them altogether. If a teenager (13–17) somehow uses the Platform in violation of our Terms, any personal data collected would be handled with care and removed once discovered. By blocking users under 13 entirely, Spasli is following FTC guidance that general audience sites **may exclude children** to avoid collecting their data.

## Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. If we make material changes, we

will **notify you** by (for example) posting a prominent notice on our website or emailing you, and by updating the effective date at the top of this Policy. We encourage you to review this Policy periodically for any updates. Your continued use of Spasli after any changes to this Privacy Policy constitutes your acceptance of the updated terms.

## **Contact Us**

If you have any questions or concerns about this Privacy Policy or Spasli's privacy practices, please contact us:

- **Support Page**

We are committed to addressing any privacy-related issues in a timely manner. If you contact us with a privacy question or request, we may need to verify your identity for security purposes before addressing your issue.

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