

# Privacy Policy

Nesy.Systems OÜ (operating as ValetOS)

Registry Number: 14977017

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## 1. Introduction

Nesy.Systems OÜ operates ValetOS, a cloud-based property management system designed for boutique and independent hotels. This Privacy Policy explains how we collect, use, store, and protect personal data when you use our platform. We are committed to transparency and compliance with the EU General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA), and other applicable privacy laws.

### WE DO NOT SELL YOUR PERSONAL INFORMATION

ValetOS does not sell, rent, or trade personal information to third parties for monetary or other valuable consideration. Your data is used exclusively to provide and improve our hotel management services. We only share data with trusted service providers who help us deliver the platform (such as hosting providers and payment processors), and only as necessary to operate the service.

## 2. Who Controls Your Data

### 2.1 Our Roles

**When you are a hotel customer:** Your hotel acts as the data controller for guest information (names, bookings, preferences). ValetOS acts as a data processor, handling this data on your hotel's behalf according to their instructions.

**When you register for ValetOS:** We act as the data controller for your account information, billing details, and communications with us.

## 3. What Information We Collect

We collect different types of information depending on how you interact with ValetOS:

### 3.1 Guest and Operational Data (processed on hotel's behalf)

- **Guest information:** Names, contact details (email, phone), booking dates, room preferences
- **Payment information:** Payment status and encrypted payment tokens (we do not store full credit card numbers)
- **Communication records:** Messages exchanged through our WhatsApp concierge service
- **Preferences and history:** Room preferences, service requests, past stay information

### 3.2 Account and Business Data (controlled by ValetOS)

- **Account details:** Hotel contact information, staff accounts, login credentials
- **Billing information:** Payment details for ValetOS subscriptions
- **Usage data:** How you use the platform, feature usage, system logs

### 3.3 Technical Data

- **Connection information:** IP addresses, browser type, device information
- **System logs:** Access logs and audit trails for security and compliance

## 4. How We Use Your Information

We use personal information for the following purposes:

- **Platform operation:** Manage reservations, process payments, coordinate housekeeping, facilitate guest communication
- **Service improvement:** Analyze usage patterns, develop new features, enhance system performance
- **Security and compliance:** Prevent fraud, maintain audit trails, comply with legal obligations
- **Customer support:** Respond to inquiries, troubleshoot issues, provide training
- **Business intelligence:** Generate operational insights, demand forecasts, and market analysis for our hotel customers
- **Communications:** Send service updates, security alerts, and (with permission) marketing information

### 4.1 Legal Basis (GDPR)

We process data based on:

- **Contractual necessity:** To provide ValetOS services under your agreement
- **Legitimate interests:** Platform security, fraud prevention, service improvement
- **Legal obligations:** Tax compliance, regulatory requirements
- **Consent:** When required (e.g., marketing communications, where applicable)

## 5. Who We Share Information With

We only share personal information with trusted partners who help us operate ValetOS. These include:

- **Infrastructure providers:** Cloud hosting services (AWS EU region) for data storage and processing
- **Payment processors:** Secure payment gateways to handle transactions
- **Communication services:** Messaging providers for guest communication features
- **Integration partners:** Booking channels and property management tools you choose to connect
- **Analytics and monitoring:** Services that help us maintain platform security and performance
- **Legal and regulatory authorities:** When required by law or to protect our rights

All third-party service providers are carefully selected and contractually obligated to protect your data and use it only for specified purposes. A current list of our key service providers is available upon request by contacting [info@valet-os.com](mailto:info@valet-os.com).

## 6. International Data Transfers

Your data is primarily hosted in AWS's European Union data centers. Some service providers may process data outside the EU. When data is transferred internationally, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) approved by the European Commission or reliance on adequacy decisions. You may request details about specific transfers by contacting us.

## 7. How We Protect Your Information

We implement industry-standard security measures to protect your data, including:

- Encryption of data in transit and at rest
- Role-based access controls limiting who can view data
- Regular security audits and monitoring
- Secure authentication and password requirements
- Audit trails to track data access and changes
- Incident response procedures

If a data breach occurs that affects personal information, we will notify affected parties and relevant authorities as required by law.

## 8. How Long We Keep Your Information

Data retention depends on the type of information and applicable legal requirements:

- **Guest data:** Retained according to your hotel's instructions and policies, typically for operational and historical purposes
- **Account data:** Maintained while your ValetOS account is active
- **Audit logs:** Retained for up to 7 years to meet compliance and dispute resolution requirements
- **Communication records:** Retained for operational purposes, typically 1-3 years

- **Billing records:** Retained as required by tax and accounting laws

Upon termination of service, hotels may request a data export. After a reasonable export period (typically 30 days), we will securely delete or anonymize customer data unless retention is required by law.

## 9. Your Privacy Rights

Depending on your location, you have rights regarding your personal information:

### 9.1 EU/GDPR Rights

- **Access:** Request a copy of your personal data
- **Correction:** Update inaccurate or incomplete information
- **Deletion:** Request deletion of your data (subject to legal obligations)
- **Restriction:** Limit how we process your data
- **Portability:** Receive your data in a structured, machine-readable format
- **Objection:** Object to processing based on legitimate interests
- **Withdraw consent:** Where processing is based on consent

### 9.2 California/CCPA Rights

California residents have additional rights:

- **Right to know:** What personal information we collect and how it's used
- **Right to delete:** Request deletion of personal information
- **Right to opt-out:** We don't sell data, but you can opt-out of certain data sharing
- **Non-discrimination:** We won't discriminate against you for exercising your rights

### 9.3 How to Exercise Your Rights

**For guest data:** Contact your hotel directly, as they control this information.

**For account or ValetOS-controlled data:** Email us at [info@valet-os.com](mailto:info@valet-os.com) or use your account settings page.

We will respond to verified requests within the timeframes required by applicable law (typically 30 days for GDPR, 45 days for CCPA).

## 10. Automated Decision-Making and AI

ValetOS uses artificial intelligence and machine learning to provide features such as:

- Demand forecasting and pricing recommendations
- Guest preference analysis and personalized suggestions
- Operational insights and pattern detection
- Automated responses through our AI concierge service

These AI systems are designed to assist hotel staff in making decisions, not to make decisions automatically with legal or similarly significant effects on individuals. Hotels maintain human oversight and final decision-making authority. We document how our AI models work and can provide explanations upon request.

## 11. Cookies and Tracking

Our website and platform use cookies and similar technologies for:

- **Essential functionality:** Authentication, security, remembering your preferences
- **Analytics:** Understanding how our platform is used to improve performance
- **Marketing:** Delivering relevant information about ValetOS (with your consent where required)

You can manage cookie preferences through your browser settings. Disabling certain cookies may affect platform functionality.

## 12. Children's Privacy

ValetOS is designed for hotel business operations and is not directed at children under 18. While hotels may process information about minor guests as part of family bookings, we do not knowingly collect personal information from children without appropriate parental consent as required by law. Hotels are responsible for ensuring compliance with applicable child privacy laws.

## 13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. Material changes will be communicated through:

- Email notification to account holders
- Prominent notice on our website and platform
- Updated "Last Updated" date at the top of this document

Continued use of ValetOS after changes become effective constitutes acceptance of the updated policy.

## 14. Contact Us & Complaints

For questions about this Privacy Policy, to exercise your privacy rights, or to file a complaint, please contact us:

**Email:** [info@valet-os.com](mailto:info@valet-os.com)

**Postal Address:**

Nesy.Systems OÜ  
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**For EU residents:** You have the right to lodge a complaint with your local data protection supervisory authority. We will cooperate with authorities and provide necessary information to resolve complaints.

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*This Privacy Policy was prepared to comply with GDPR, CCPA, and other applicable privacy regulations. For questions about compliance or to request our Data Processing Agreement (DPA) for hotel customers, please contact [info@valet-os.com](mailto:info@valet-os.com).*