

Privacy Policy

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This Privacy Policy explains how **Loyvel** ("Loyvel", "we", "us", or "our") handles personal information collected through our pre-launch website and waitlist (the "Site").

Loyvel is currently **in development and pre-launch**, with the platform expected to launch on **December 1, 2026**. Until then, the Site operates as a marketing and lead-generation page. We do **not** currently process bookings, accept payments, or provide transportation or accommodation services. The personal data we collect is the information you choose to submit through our waitlist / interest forms, together with limited analytics data collected through cookies where you have given consent.

When Loyvel launches, we intend to act as the seller and merchant of record for two separate, independent services - accommodation stays and local transportation - fulfilled by independent hosts and drivers. That model will involve additional processing (such as booking and payment data) and will be covered by separate, updated terms and privacy information presented to you at that time. The present policy covers only the pre-launch waitlist Site.

We aim to keep this notice short, honest, and aligned with the General Data Protection Regulation (GDPR) and similar privacy laws.

1. Who we are

Loyvel is the controller responsible for the personal data described in this policy.

- **Company / operator:** Loyvel
- **Contact email:** hello@loyvel.com

Note: Loyvel is an early-stage venture and is not yet formally incorporated. If our legal entity details or registered address change as the company is established, we will update this policy.

2. What personal data we collect

We only collect the information you provide when you submit one of our pre-launch forms, plus limited technical metadata that is automatically attached to your submission for security and abuse-prevention purposes.

Depending on which interest group you select, we collect:

Everyone who submits a form:

- Full name
- Your acceptance of our Terms and Privacy Policy (we store which version you accepted)

Travellers / tourists:

- Email address

Accommodation hosts:

- WhatsApp number (country code and number)
- Types of accommodation you offer (e.g. villa, guesthouse)
- Areas where your property is located

Drivers:

- WhatsApp number (country code and number)
- A short description of your vehicle
- Areas where you operate

Automatically collected with each submission:

- IP address
- Browser user-agent string (device/browser information)
- Date and time of submission

Collected through analytics cookies (only if you consent):

- Online identifiers and cookie IDs
- Pages you view and how you interact with the Site
- Approximate location, derived from your IP address (which Google Analytics truncates)
- Device and browser information

We only collect analytics data if you accept analytics cookies through our cookie banner, and you can withdraw that consent at any time. See our Cookie Policy for the full details.

We do **not** collect special-category data (such as health, biometric, or financial data), and we do **not** ask for payment information.

3. Why we collect it (purposes and legal bases)

Purpose	Data used	Legal basis (GDPR)
Add you to our waitlist and contact you about the launch, early access, and relevant updates	Name, email, WhatsApp number, audience type, areas, property/vehicle details	Consent (Art. 6(1)(a)), given when you submit the form
Understand demand and tailor the service (e.g. which areas and audiences are interested)	Audience type, areas, property/vehicle details	Legitimate interests (Art. 6(1)(f)) in planning our launch
Keep a record that you accepted these terms	Consent versions, submission timestamp	Legal obligation / legitimate interests
Protect the Site against spam, abuse, and duplicate submissions	IP address, user-agent, timestamp	Legitimate interests (Art. 6(1)(f)) in securing our service
Understand how visitors find and use the Site so we can improve it	Usage data collected via Google Analytics	Consent (Art. 6(1)(a)), given through the cookie banner

We will not use your contact details for purposes you would not reasonably expect, and we will not sell your personal data.

4. Cookies and tracking technologies

We use cookies and similar technologies on the Site:

- **Strictly necessary cookies** - required for the Site to work securely and to remember your cookie choices. These do not require consent.
- **Google Analytics** - a service provided by Google that we use to understand how the Site is used and to improve it. Analytics cookies are only set **after you consent** through our cookie banner, and you can withdraw that consent at any time.

We do **not** use advertising or targeting cookies, and we do **not** use cookies to build a marketing profile of you or to serve you ads.

Separately from cookies, we record the **IP address** and **browser user-agent** attached to a form

submission, and standard **server access logs** (which include IP address, request time, and the page requested). These are used for security, debugging, and abuse prevention - not for advertising or cross-site tracking.

For the full details of the cookies we use, please see our separate **Cookie Policy**.

5. Who we share data with (third-party processors)

We keep the number of third parties to a minimum. We currently rely on the following service providers to operate the Site:

- **Hetzner Online GmbH (hosting provider):** provides the servers, located in Falkenstein, Germany (EU), on which the Site and its database run. Your submitted data is stored here.
- **Database (MySQL) and deployment tooling (Coolify):** run on the Hetzner infrastructure above to store your form data and operate the application.
- **GitHub / GitHub Container Registry:** stores our source code and application images (this does not contain your personal data).
- **Google (Google Analytics):** provides website analytics. Where you consent to analytics cookies, Google processes usage data on our behalf to help us measure and improve the Site. Google may process this data outside the EEA (see "Where your data is stored" below). The provider is Google Ireland Limited, with Google LLC (USA) acting as a sub-processor.

We do **not** currently use a third-party email marketing platform, payment processor, or error-tracking service. If we add any of these before or after launch, this policy will be updated to name them.

WhatsApp and Instagram are listed on our Site only as ways to contact us; we do not automatically share your data with them.

6. Where your data is stored

The information you submit through our forms is hosted on servers located in **Falkenstein, Germany**, within the European Union (provided by Hetzner), and is therefore stored within the European Economic Area (EEA).

Where you consent to analytics cookies, the analytics data collected through Google Analytics may be processed by Google on servers located outside the EEA, including in the **United States**. Such transfers are protected by appropriate safeguards, such as the EU Standard Contractual Clauses and/or the EU-US Data Privacy Framework. If our storage or transfer arrangements change, we will update this policy and put appropriate safeguards in place.

7. How long we keep your data

We retain waitlist information until:

- you request deletion;
- the waitlist is discontinued; or
- the information is no longer needed for the purposes described in this policy.

We do not currently run an automatic deletion schedule, so your waitlist and interest data is kept for as long as we operate Loyvel unless you request its removal.

You can ask us to delete your data at any time by emailing **hello@loyvel.com** (see "Your rights"

below). We will delete it promptly unless we are legally required to keep it.

8. Your rights

If you are in the EEA, the UK, or a jurisdiction with similar laws, you have the right to:

- **Access** the personal data we hold about you.
- **Rectify** inaccurate or incomplete data.
- **Erase** your data ("right to be forgotten").
- **Restrict** or **object** to certain processing.
- **Data portability** - receive your data in a usable format.
- **Withdraw consent** at any time, without affecting processing done before withdrawal.
- **Lodge a complaint** with your local data protection authority.

To exercise any of these rights, contact us at **hello@loyvel.com**. We will respond within the timeframe required by applicable law (generally within one month).

9. How we protect your data

We use reasonable technical and organisational measures to protect your data, including access controls, encrypted transport (HTTPS), and a stateless backend that does not rely on browser cookies. No system is perfectly secure, but we work to keep your information safe and to limit who can access it.

10. Children

The Site is not intended for children!

The Site is not directed at children, and we do not knowingly collect personal data from anyone under the age required by local law (typically 16 in the EEA). If you believe a child has submitted data, contact us and we will delete it.

11. Changes to this policy

As Loyvel develops toward launch, our data practices may change. We will update this policy and revise the "Effective Date" and "Version" above when we do. Material changes will be communicated where appropriate.

12. Electronic communications

By submitting information through the Site, you agree that we may communicate with you electronically, including by email and messaging platforms such as WhatsApp where you have provided those details.

13. Contact

Questions or requests regarding this policy or your data:

- **Loyvel**
- **Email:** hello@loyvel.com