Cercles Privacy Policy

Last updated: October 28, 2026

This Privacy Policy explains how Rare Capital, LLC, which operates Cercles ("Cercles", "we", "us" or the "Owner"), collects, uses and protects personal data when you use the website at www.my-cercles.com, the Cercles mobile applications and related services (together, the "Application"). It is written to meet the requirements of applicable data protection laws, including the California Consumer Privacy Act (CCPA), Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and the EU General Data Protection Regulation (GDPR) (together, "Data Protection Laws").

Cercles is a private, curated membership community where Members connect, attend events and share with one another, including homes and, over time, other things such as cars, boats and event tickets.

Definitions

Terms defined in the Cercles Terms of Use have the same meaning here. In addition:

- "Personal Data" means any information that can identify an individual, as defined by applicable Data Protection Laws.
- "Processing" means any use of Personal Data by us.
- "User" or "Member" means anyone who uses the Application.

1. International transfers

1.1 We collect Personal Data from Users through the Application.

1.2 We may transfer Personal Data outside the EU or your home jurisdiction only to provide the Application and the services you use, and only to third parties that maintain confidentiality and data protection safeguards sufficient to protect it. By registering, you agree to these transfers.

1.3 To learn how and to whom your data may be transferred, contact contact@my-cercles.com.

2. Personal Data we collect and why

2.1 General

We collect Personal Data that you provide when you apply, open an account or use the Application. If you want to know about any specific use of your data, email contact@my-cercles.com.

2.2 Information you provide

We collect information you provide:

- when you apply for membership or register;
- in correspondence, support requests, surveys and when you make payments;

- when you use features of the Application, including listing a home, arranging a stay, attending events or sharing other items;
- when you upload content or send messages through the Application;
- through another Member who arranges a stay or event that includes you, where you have agreed to this; and
- if you subscribe to our newsletter.

This may include your name; email address and phone number; postal code, age and gender; a photo of your government ID and a selfie for identity verification (see Section 13); travel and stay preferences; links to your social media profiles; location; insurance information where needed; information about homes or items you list, including any registration or licence numbers; payment information; and other information that identifies you.

2.3 Information we collect automatically

We collect technical data from your device and browser using cookies and similar technologies, such as device identifiers, IP address, device and browser characteristics, and how you use the Application. We treat identifiers such as IP addresses as Personal Data where the law requires. If you block cookies, parts of the Application may not work properly, and we are not liable for the resulting loss of functionality.

2.4 Information from others

We may receive Personal Data from third parties, social networks or integrations you choose to link. When you link an account, some of its information may appear on your profile, other Members may see contacts, schools, hometowns or groups you have in common, and the information may be used for fraud prevention, security and risk assessment, subject to your settings.

2.5 Non-Personal Data

The limits in this Policy do not apply to data that cannot identify you. If we combine such data with your Personal Data, we treat the combination as Personal Data.

2.6 How we use Personal Data

We use Personal Data to:

- give you access to the Application and its features;
- operate, secure and improve the Application, including analytics and research;
- send service, support, security and administrative messages;
- carry out our agreements with you, including billing for the Membership and any service fees;
- send marketing and promotional messages, including from partners we think may interest you, where the law allows and subject to your right to opt out;
- carry out fraud prevention, authentication, monitoring and verification;
- let Members connect, list homes and other items, arrange stays and attend events with one another;

- comply with our legal obligations, resolve disputes and enforce our agreements; and
- send important notices, such as purchase confirmations and changes to our terms and policies. You cannot opt out of these.

2.7 Sharing Personal Data

We do not sell your Personal Data for money. We share Personal Data only:

- with other Members, to the extent needed for Members to connect, attend events, and arrange stays or share items with one another;
- with service providers that help us run the Application, such as hosting, analytics and payment providers, under confidentiality and data protection obligations;
- where we believe disclosure is necessary to protect the rights, property or safety of Cercles, our Members or others, including for fraud prevention and credit risk reduction, limited to what is strictly necessary;
- with analytics and advertising partners, as described in Section 8 (Personalisation, analytics and advertising);
- with public authorities, where we believe the law requires it, including requests for listing, registration or Member information under laws that regulate home rentals and stays; and
- with your permission.

2.8 Providing data is optional

You do not have to provide the Personal Data we request, but if you do not, we may be unable to provide some services.

2.9 What other Members see

Your Personal Data is not displayed publicly or to other Members unless you choose to share it, or as required by law or permitted by this Policy.

2.10 Background checks

To keep the community safe, and where the law allows, we may obtain background information about applicants and Members. In the United States this may include criminal records and sex offender registrations. Outside the United States, and with your consent where required, we may obtain police, background or sex offender checks. We may use your full name and date of birth for this.

2.11 Third parties you interact with

Some features connect you with third parties, such as payment providers, that process data for their own purposes under their own privacy policies. We are not responsible for their processing. Please read their policies before giving them your data.

3. Minors

The Application is for adults aged 18 and over. We do not knowingly collect Personal Data of anyone under 18, except where a parent or guardian provides it because a minor is included in a stay or event.

4. Pseudonymous use

If we offer the option to use a nickname or pseudonym, your activity will appear under it. Content you share may still reveal your identity directly or indirectly.

5. Push notifications

The Application may send push notifications for the purposes in this Policy, including notifications based on your location and, where the law allows, direct marketing about our own or third-party products and services. You can turn notifications off in your device settings, and use the rights described in this Policy. Turning them off may reduce the usefulness of the Application.

6. Payments

We use Personal Data to process payments for the Membership and any service fees. Payments are handled by third-party payment providers. Cercles does not collect or store full card or bank details. Payments between Members for stays or shared items are processed by the payment provider directly to the receiving Member's own account; the payment provider, not Cercles, receives the card or bank details used.

7. Device and usage identifiers

The Application may store a unique device identifier or a universally unique identifier (UUID) for analytics and to remember your preferences, and may record your location and how you use the Application. A UUID persists between launches and updates and is removed when you delete the app. If you do not want this information collected, contact us at the address below.

8. Personalisation, analytics and advertising

8.1 To improve your experience, personalise what you see in the Application, understand how Members use it, and reach people who may want to join Cercles, we work with analytics and advertising partners. These partners may use software in the Application, cookies, pixels or similar technologies to collect information such as device identifiers, usage and interaction data, purchase history, search history and contact information.

8.2 This information may be linked with data from other companies' apps and websites, to measure how well our features and campaigns work and to show you more relevant content and advertising, including Cercles ads on other apps and websites. Apple calls this "tracking".

8.3 On iPhone and iPad, we track you only if you allow it when the Application asks. You can change your choice at any time in your device's Settings, under Privacy & Security > Tracking. On the web, you can manage cookies in your browser settings. Declining does not affect your access to Cercles.

8.4 Under some laws, including the CCPA, this kind of sharing may be considered "sharing" for cross-context behavioural advertising or a "sale". You can opt out at any time by emailing contact@my-cercles.com with the subject "Do not sell or share", and we will honour browser-based opt-out signals such as Global Privacy Control where the law requires. Where the GDPR or similar laws apply, we use these technologies for advertising only with your consent.

9. Contact and data controller

Cercles, Rare Capital, LLC
Email: contact@my-cercles.com

10. No discrimination for opting out

We will not discriminate against you for refusing consent to processing. We will stop providing a service only to the extent the Personal Data is needed to provide it.

11. Changes to this Policy

We may update this Policy. If we make substantive changes, we will update the "Last updated" date and inform Members. Changes take effect when posted.

12. Retention and deletion

We keep Personal Data for up to two years after your account is closed or you stop using our services, for record-keeping, unless the law requires us to keep it longer. After that, we may permanently delete it. While we keep it, we will not share it with third parties except where the law requires.

13. Identity verification and sensitive data

13.1 **Identity verification.** To keep the community trusted, we may ask you to verify your identity with a photo of a government ID (such as a passport) and a selfie. This check is run by our identity verification provider, Stripe, which compares your selfie with the photo on your ID. That comparison uses biometric data (facial geometry). Stripe processes it on our behalf to confirm that you are the person on the ID, under its own security and retention rules. We receive the result of the check and the identity details needed to confirm it. We ask for your consent before the check starts.

13.2 **Gender.** We collect your gender to run features that depend on it, such as homes offered only to women.

13.3 **How we use this data.** We use identity verification data, gender and background check information (Section 2.10) only to verify Members, keep the community safe and run the features that need them. We do not use them for advertising, and we do not share them with advertising partners.

13.4 **Data we do not collect.** We do not ask for information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, health, sex life or sexual orientation.

14. Data breaches

We will notify you of any breach of Personal Data stored on the Application within 72 hours of becoming aware of it, together with the steps we have taken to address it.

15. Copyright notices (DMCA)

We respond to notices under the Digital Millennium Copyright Act. If you believe material on the Application infringes your copyright, email contact@my-cercles.com with: (i) your full name, address, phone number and email; (ii) a description of the copyrighted work; (iii) where the material appears on the Application; (iv) a statement of your good-faith belief that the use is not authorised; and (v) a signed statement, under penalty of perjury, that your notice is accurate and that you own or are authorised to act for the copyright owner. You may be liable for damages if you materially misrepresent an infringement.

16. California rights (CCPA)

Where the CCPA applies, we do not sell Personal Data for money; sharing for advertising is described in Section 8. California residents have the right to know what Personal Data we collect, to access it, to request its deletion, to opt out of any sale or sharing (see Section 8.4), and not to be discriminated against for exercising these rights. We will respond to verifiable requests within the time the law requires. Contact contact@my-cercles.com.

17. EU and EEA rights (GDPR)

If the GDPR applies to you, you have the right to: withdraw consent at any time; access your Personal Data and receive a copy; correct inaccuracies; have it erased; data portability; restrict processing; and object to processing. These rights are free to exercise, subject to the limits in the GDPR. We may need to verify your identity. Send requests to contact@my-cercles.com. You may also complain to your local data protection authority.

18. Canada (PIPEDA)

Our practices follow PIPEDA's fair information principles. We have appointed a privacy officer, collect and use Personal Data only as described here, take reasonable steps to keep it accurate, and protect it with appropriate safeguards. Canadian residents may request access to and correction of their Personal Data and challenge our compliance by emailing contact@my-cercles.com.

19. Other privacy laws

If you have rights under any other privacy law, contact contact@my-cercles.com and we will respect them as that law requires.

20. Removing content posted by minors

If you are under 18 and cannot remove content you posted, email contact@my-cercles.com with what you want removed and where it appears. We are not required to remove content that the law requires us to keep, that was not posted by you, that is anonymised, where you have not followed our removal instructions, or where you received compensation for it. Removal may not remove all copies from our or our providers' systems; we may meet our obligations by anonymising the content or hiding it from others.

21. Confidentiality

When we share Personal Data with third parties, we require confidentiality and protection equivalent to this Policy. We do not make your Personal Data public without your authorisation.

22. Data security

We take commercially reasonable physical, administrative, personnel and technical measures to protect Personal Data, but no system is completely secure. You are responsible for keeping your password confidential. We are not responsible for circumvention of privacy settings or security measures.

23. Accessing and correcting your data

You can request access to, or correction of, the Personal Data we hold by emailing contact@my-cercles.com. If we cannot give you access to all of it, we will tell you why. We may need to verify your identity.

24. Disputes

This Privacy Policy forms part of the Cercles Terms of Use. To the extent permitted by applicable privacy law, disputes about it are resolved as described in the Terms of Use.