

Privacy Policy HousingAnywhere

27 November 2024

During the processing of personal data HousingAnywhere works in line with the General Data Protection Regulation (GDPR). This means we:

- **clearly specify our purposes** before we process personal data, by using this privacy statement;
- **limit our collection of personal data** to only the personal data needed for legitimate purposes;
- first, **ask for explicit permission** to process your personal data in cases where your permission is required;
- take **appropriate security measures** to protect your personal data and we demand the same from parties who process personal data on our behalf;
- **respect** your right to access, correct, or delete your personal data held by us.

HousingAnywhere is the party responsible for all data processing. In this privacy policy, we will explain what kind of personal data we collect and for which purposes within our website <https://housinganywhere.com/>. We recommend that you read it carefully.

If you have any questions regarding the processing of personal data, you can find the contact details of HousingAnywhere at the end of this privacy statement.

Definitions

Data Controller: HousingAnywhere or Data Controller is the party responsible for our personal data under this Privacy Policy.

Personal Data: Any information concerning a natural person, a legal person, an institution, or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

User: Anyone who registers an account with HousingAnywhere.

Tenant: Anyone who is searching for accommodation to rent on HousingAnywhere.

Advertiser: Anyone who is seeking to list, rent or sublet their property on HousingAnywhere.

Listings: Any property that is uploaded onto HousingAnywhere and is available to rent.

Listings include property photos, descriptions, and addresses.

Third-Party: Any affiliate service that HousingAnywhere does business with.

1. Registration on the HousingAnywhere Platform

Certain features of our service require you to register beforehand. You will have to provide some information about yourself and choose a username and password for the account that we will set up for you.

For this purpose, we use your name, email address, and date of birth. We will retain this data so that you do not have to re-enter it every time you visit our website and in order to

contact you in connection with the execution of the agreement, invoicing and payment, and to provide an overview of the services you have used from us.

2. Information you choose to give us

You can choose to provide us with additional personal information. This information may include:

Profile Information: When Listing or booking accommodation we ask for information such as an address, phone number, preferred language(s), and a profile picture. Some of this information as indicated in your account settings is part of your public profile page and will be publicly visible.

Documents requested by advertisers: Advertisers are able to request documents for the creation of rental contracts from the following 3 categories: ID document, proof of occupation or enrolment and proof of income. If an advertiser chooses to require any of these documents, they will have to specifically accept the conditions to only use them for the purpose of creating a rental agreement.

Other Information: Such as when you fill in a form, add information to your account, respond to surveys, communicate with our customer care team and other Members, or share your experience with us. This may include health information if you choose to share it with us.

3. Information collected by using the HousingAnywhere Platform and our Rent Payments Services.

By using the HousingAnywhere Platform and Rent Payments Services, we automatically collect personal information. This information may include:

- Pages or content you view, searches, bookings you have made, and other actions on the Platform.

- Logging data about how you've used the HousingAnywhere Platform, IP address, access dates and times, hardware and software information, device information, unique identifiers, crash data, cookie data. We will collect this information even if you haven't created a HousingAnywhere account or logged in.

- In order to process the Rent Payments, HousingAnywhere requires certain financial information such as the payment instrument used, payment amount, payment instrument expiration, and other related transaction details.

In addition, HousingAnywhere may require identity verification information (such as images of your government-issued ID document) or other authentication information (such as your date of birth, your address, email address, phone number) and other information in order to verify your identity, provide the Payment Services to you, and to comply with applicable law.

4. Receiving data from Third Parties

If you sign up or log in to the HousingAnywhere Platform with a Third Party Service (e.g. Facebook or Google), you direct the service to send us information such as your registration, friends list, and profile information as controlled by that service or as authorized by you via your privacy settings at that service.

5. Why does HousingAnywhere collect and use your personal data?

a. To provide our services to you

We use the personal data described above to handle your reservations and bookings and to ensure the best use of our service. We'll also use that data to contact you, inform you and update you on the booking process through service emails.

We may also, either directly or through Third Party companies and individuals we engage to provide services to us, review, scan, or analyze your communications with other Users exchanged via our messaging system for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, and customer support purposes. For example, as part of our fraud prevention efforts, HousingAnywhere scans and analyzes messages to mask contact information and links to other websites. This helps to prevent fraudsters from asking tenants to send them money outside of the HousingAnywhere website, such as by bank transfer or other money transfer methods.

b. Sending newsletters

We have a newsletter to inform those interested in news, tips, and information about our products and services. Your email address is added to the list of subscribers, only with your permission.

For this purpose, we use your email address. We do this only on the basis of your consent. We store this information until you cancel your subscription. You may cancel your subscription to our newsletter at any time. Each newsletter contains a link to unsubscribe from our newsletter.

c. Statistical research and profiling

We keep statistics on the use of our website. These statistics help us to, for example, only show you information that is relevant to you. We use our research results to develop better services and offers for our customers. We only use 'aggregated data' for our research. This is data that cannot be traced back directly to you because all directly identifiable elements (e.g. names and e-mail addresses) are removed. We make sure that only a limited group of employees has access to the data set.

We also do profiling for the purposes of fraud prevention. In this way, we are

able to decrease the number of potential scammers or fraudsters making use of our platform.

We may combine personal data to get to know more about you. We will of course respect your privacy at all times. If you do not want us to do these statistics, please let us know.

Legal basis

We may collect and use your personal data only if we have a legal basis for doing so. In many cases, we need your personal data to receive your booking, process your rent payments or to answer your questions. In those cases, the legal basis for processing your data is 'necessary for the performance of a contract'.

If you have given consent to the collection and use of your personal data, we will collect and use your data based on that consent.

Finally, we may use your personal data if we or Third Parties have a legitimate interest in doing so. We will always consider all interests carefully: your interests, the interests of others, and HousingAnywhere's interests. On that legal basis, we will collect and use your data to improve, for instance, the HousingAnywhere platform, statistical research, or direct marketing purposes, or to offer personalized discounts and offers.

6. Providing data to Third Parties

Except for the parties necessary to deliver the above-mentioned services, we do not under any circumstance provide your personal data to other companies or organizations, unless we are required to do so by law (for example, when the police demand access to personal data in case of a suspected crime).

Under certain circumstances and conditions, we work with third parties like Business Partners (Affiliates), that we use in order to promote our listings to a broader audience. Affiliates aim to drive users to an operator's site/app (HousingAnywhere) with the aim of such users signing up and booking a room. This means that the operator will be a controller in respect of such users once they have entered the operator's site/ app (HousingAnywhere), but prior to this, the operator has no relationship with the traffic that is being driven towards the Affiliates site. No personal data is shared with our business partners.

Our website features social media buttons. These buttons are used by the providers of these services to collect your personal data.

The categories of third parties we work with to deliver our services are:

- Advertisers of accommodation or tenants with a confirmed booking
- Business Communication and Collaboration Tool
- Data Analytics Provider
- Hosting Services Provider
- Data Storage Service Provider
- Payment Processor

Ad Network
Social Network
Sales and Marketing Tool
Product Engineering and Design Tool

7. Security and Retention

We take security measures to reduce misuse of and unauthorized access to personal data. We take responsibility for the security of your personal data. We renew our security measures to ensure the safe storage of personal data and keep track of what might go wrong.

HousingAnywhere complies to the European Law for Data Security. All data is sent over an encrypted connection from your browser to our server (HTTPS). You can verify this by checking that the lock icon is shown in the browser address bar. Furthermore we strive to always use the latest available security information to secure our servers, applications and other services to ensure your data is safe.

We will store data for as long as we deem necessary to enable you to use our service, comply with appropriate laws, resolve any disputes between parties, and detect and prevent potential fraudulent activities.

All financial transactions are handled by our payment partner which is fully PCI (DSS 2.0 standard) Level 1 compliant, supervised by the Dutch Central bank as a payment institution and complies with all the requirements of the European Commission's Payment Service Directive (PSD2, 2015/2366/EU).

Documents uploaded for the purpose of concluding a rental agreement with an advertiser have a retention period on our platform of maximum 12 months after the user's last profile activity, 6 months after the move-out date or within 30 days in case no booking was confirmed and the user requests the deletion of the document or the account.

8. Data protection officer

We have appointed a *data protection officer*. This person is responsible for privacy matters within our organization. Our data protection officer is and is available by email DPO@HousingAnywhere.com for all your questions and requests.

9. Changes to this privacy statement

We reserve the right to modify this statement. We recommend that you consult this statement on a regular basis so that you remain informed of any changes.

10. Cookie statement

Also read our [cookie statement](#), where we explain what cookies we use and why. Page 5 of 7

11. Inspection and modification of your data

You can always contact us at support@housinganywhere.com if you have any questions regarding our privacy policy or wish to review, modify or delete your personal data.

You have the following rights:

- Right of access: you have the right to see what kind of personal data we processed about you;
 - Right of rectification: you have the right to rectify any personal data we have processed about you, if this information is (partially) wrong;
 - Right to complain: you have the right to file a complaint against the processing of your personal data by us, or against direct marketing;
 - Right to be forgotten: you can file a request with us to remove any personal data we have processed of you;
 - Right to data portability: if technically possible, you have the right to ask us to transfer your processed personal data to a Third Party;
 - Right to restriction of processing: you can file a request with us to (temporarily) restrict the processing of your personal data.
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- Withdrawal of consent: if we are processing your personal information based on your consent you can withdraw your consent at any time by changing your account settings or by sending us an e-mail with which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.

If you exercise any of the rights mentioned above, we might ask to identify yourself with a valid ID, to confirm it is your personal data. If so, it is important that you hide your social security number and photo.

We will usually respond to your request within one month. This term can be extended if the request is proven to be complex or tied to a specific right. You will be notified about a possible extension of this term.

12. Complaints

If you want to file a complaint about our use of personal data, please send an email with the details of your complaint to privacy@HousingAnywhere.com. We will look into and respond to any complaints we receive.

If you think that we are not helping you in the right way, you have the right to file a complaint at the authority. For The Netherlands, this is the Autoriteit Persoonsgegevens.

13. HousingAnywhere App on Apple Store and Google Play

Push Notifications Our app requests permission to send push notifications. These notifications may include updates on your bookings, reminders, and promotional information relevant to our services. You can manage your notification preferences within your device

settings or the app settings section at any time.

Camera Access

Our app may request permission to access your device's camera for specific features, such as uploading a profile picture, submitting documents, or scanning QR codes. Camera access is strictly limited to these purposes and is only activated when you choose to use these features.

We do not collect, store, or share any images or data captured via the camera without your explicit consent. You can manage or revoke camera permissions via your device's settings at any time. Please note that if camera access is denied, certain app functionalities may be limited.

AppTracking Transparency

In compliance with Apple's AppTracking Transparency framework, we may request your permission to track activity across apps and websites to deliver a more personalized experience. This includes tailored advertisements, relevant content, and performance analytics. If you allow tracking, we may collect and share the following data:

- Device information (e.g., operating system, device type)
- Interaction with advertisements (e.g., clicks, views)
- App usage and analytics data (to improve functionality and user experience)

Some data may be shared with trusted third-party partners, such as advertising networks and analytics providers, to enhance app functionality and provide tailored services. These partners are required to adhere to strict confidentiality and data security standards.

You can manage or revoke your tracking preferences at any time through your device's settings. If you decline tracking, your experience may be less personalized, but you will still be able to use the app.

Data Collection and Sharing To ensure the proper functioning of our app and provide you with seamless service, certain data collected within the app will only be shared internally within the HousingAnywhere group. This data is used solely to facilitate our services, such as supporting your bookings, account management, and providing assistance as necessary.

HousingAnywhere adheres to stringent data protection measures to safeguard this information and ensure compliance with all applicable privacy laws. No data is shared with external parties without your explicit consent, except as required by law or outlined in this policy.

User Data Management

You have control over your data within the app. Key options include:

- **Manage Notifications:** Enable or disable push notifications through the app or device

settings.

- **Control Camera Permissions:** Adjust camera access permissions in your device settings.
- **Manage AppTracking Transparency Preferences:** Opt in or out of tracking via your device settings.
- **Request Data Deletion:** Contact support@housinganywhere.com to request data deletion or other modifications.

We aim to address all data-related requests within one month, in accordance with applicable regulations.

14. Data Security and Compliance

We are committed to protecting your privacy. All data collected is encrypted during transmission and stored securely using industry-standard practices. We comply with relevant privacy regulations, including the General Data Protection Regulation (GDPR).

If you have any questions about your data or this privacy policy, please contact us at:

HousingAnywhere B.V.

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support@housinganywhere.com