# **Privacy Policy**

Last updated: 8 July 2024

This privacy notice for Property AI Ventures Ltd (trading as Rentsmart) ('Rentsmart', 'we', 'us', or 'our') details how and why we collect, store, use, and/or share ('process') your information when you use our services ('Services'), including when you:

- Visit our website at https://www.rentsmartai.com/, or any website that links to this notice
- Use our web application (Rentsmart) or any other application that links to this notice
- Interact with us in other ways, such as through sales, marketing, or events

#### **Questions or Concerns?**

This privacy notice will help you understand your privacy rights and options. If you disagree with our policies and practices, please refrain from using our Services. For any questions or concerns, please contact us at contact@rentsmartai.com.

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# 1. Privacy Notice Summary

This summary provides key points from our privacy notice. For more details on any topic, click the link following each key point or use our table of contents below to navigate to the relevant section.

- What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on your interactions with Rentsmart, the choices you make, and the products and features you use. Learn more about personal information you disclose to us.
- Do we process any sensitive personal information? We do not process sensitive personal information.
- Do we receive any information from third parties? We do not receive any information from third parties.
- How do we process your information? We process your information to provide, improve, and manage our Services, communicate with you, ensure security and fraud prevention, and comply with legal obligations. We may also process your information for other purposes with your consent. We only process your information when we have a valid legal reason to do so. Learn more about how we process your information.
- In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information.
- How do we keep your information safe? We have organisational and technical measures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure. We cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.
- What are your rights? Depending on your geographical location, applicable privacy laws may grant you certain rights regarding your personal information. Learn more about your privacy rights.
- How do you exercise your rights? The easiest way to exercise your rights is by submitting a data subject access request or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what Rentsmart does with any information we collect? Review the privacy notice in full.

# 2. Information we collect

#### Personal Information You Provide to Us

We gather personal information that you choose to give us when you register on our Services, express interest in learning more about us or our products and Services, participate in activities on the Services, or otherwise get in touch with us.

Personal Information Provided by You: The personal information we collect varies depending on your interactions with us and the Services, your choices, and the products and features you use. This may include:

- Names
- Email addresses
- Usernames
- Passwords
- Contact preferences

Application Data: When using our application(s), we may also collect the following information if you grant us access or permission:

• Geolocation Information: We may request access to track location-based information from your mobile device, either continuously or while you are using our web application(s), to offer location-based services. You can modify these permissions in your device's settings.

This information is primarily needed to maintain the security and functionality of our application(s), for troubleshooting, and for internal analytics and reporting.

All personal information you provide must be true, complete, and accurate, and you must notify us of any changes.

#### Information Automatically Collected

We automatically gather certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage data, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, and information about how and when you use our Services. This data is primarily needed to maintain the security and operation of our Services, and for internal analytics and reporting.

We also collect information through cookies and similar technologies.

The information we collect includes:

 Log and Usage Data: This data includes service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services, and is recorded in log files. This log data may include your IP address, device information, browser type and settings, and details about your activity in the Services (such as date/time stamps, pages viewed, searches, and actions taken),

device event information (such as system activity, error reports, and hardware settings).

 Device Data: We collect information about the computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this data may include your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration.

# 3. How we process your information

We process your personal information for various reasons, depending on your interactions with our Services, including:

- To facilitate account creation and authentication and manage user accounts: We process your information to help you create and log in to your account and maintain its functionality.
- To deliver and facilitate the delivery of services to users: We process your information to provide you with the services you request.
- To respond to user inquiries and offer support: We process your information to respond to your questions and resolve any issues related to the services you request.
- To fulfil and manage orders: We process your information to handle orders, payments, returns, and exchanges made through the Services.
- To enable user-to-user communications: We process your information if you use our features that allow communication with other users.
- To protect an individual's vital interests: We process your information when necessary to safeguard an individual's vital interests, such as preventing harm.
- To share with letting agents: With explicit permission, we may share user data with estate agents to facilitate home discovery, schedule viewings, and manage other aspects of home renting.

# 4. Legal bases relied upon to process you information

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on to process your personal information. Therefore, we may rely on the following legal bases to process your personal information:

- **Consent:** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.
- **Performance of a Contract:** We may process your personal information when it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request before entering into a contract with you.
- **Legal Obligations:** We may process your information when it is necessary for compliance with our legal obligations, such as cooperating with a law enforcement body or regulatory agency, exercising or defending our legal rights, or disclosing your information as evidence in litigation in which we are involved.

• **Vital Interests:** We may process your information when it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

# 5. When and with whom we share your personal information

We may need to share your personal information under the following circumstances:

- Business Transfers: We may share or transfer your information during negotiations for, or in connection with, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.
- Use of Google Maps Platform APIs: We may share your information with certain Google Maps Platform APIs (e.g., Google Maps API, Places API). We may obtain and store your location on your device ('cache'). You can revoke your consent at any time by contacting us using the contact details provided at the end of this document.

# 6. How long we keep your information

We will retain your personal information only as long as necessary to achieve the purposes outlined in this privacy notice, unless a longer retention period is required or permitted by law (such as for tax, accounting, or other legal requirements). No purpose in this notice will necessitate keeping your personal information longer than the period in which you maintain an account with us.

When we no longer have an ongoing legitimate business need to process your personal information, we will either delete or anonymize it. If deletion or anonymization is not possible (for example, if your personal information is stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is feasible.

# 7. How we keep your information safe

We have implemented appropriate technical and organisational measures to safeguard the personal information we process. However, despite our efforts to secure your information, no method of electronic transmission over the Internet or data storage is completely secure. Consequently, we cannot guarantee absolute security against unauthorised access by hackers, cybercriminals, or other third parties.

Although we strive to protect your personal information, you transmit it to and from our Services at your own risk. It is important to access the Services only in a secure environment.

# 8. Do we collect information from minors

We do not intentionally solicit data from or market to children under 18 years of age. By using the Services, you confirm that you are at least 18 years old or that you are the parent or guardian of a minor under 18 and consent to their use of the Services. If we become aware that we have collected personal information from users under the age of 18, we will deactivate the account and take reasonable steps to delete such data from our records promptly. If you become aware of any data we may have collected from children under 18, please contact us at contact@retnsmartai.com.

# 9. Your privacy rights

In certain regions (like the EEA and UK), you have specific rights under applicable data protection laws. These rights may include:

- (i) Requesting access to and obtaining a copy of your personal information
- (ii) Requesting rectification or erasure of your personal information
- (iii) Restricting the processing of your personal information
- (iv) Data portability, if applicable

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us at contact@rentsmartai.com.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and believe we are unlawfully processing your personal information, you have the right to lodge a complaint with your Member State data protection authority or the UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing Your Consent: If we rely on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent by contacting us at <u>contact@rentsmartai.com</u>

However, withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

#### Account Information:

If you would like to review or change the information in your account or terminate your account, contact us at contact@rentsmartai.com.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms, and comply with applicable legal requirements.

Cookies and Similar Technologies: Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject cookies. If you choose to remove or reject cookies, this could affect certain features or services of our Services. You may also opt out of interest-based advertising by advertisers on our Services.

## 10. Updates to our privacy policy

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and will become effective as soon as it is accessible. If we make significant changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to stay informed about how we are protecting your information.