PERSONAL DATA PROTECTION AGREEMENT

HOUSEPEDIA INC

1. In order for Housepedia to perform properly and provide its service, it has to process personal information. The following information may be gathered by the system in order to properly function as a service. Under no circumstances will this data be shared with any third parties without prior consent from the user. Explanations and reasoning are provided for each type of information.

   1.1. Name – The name is used in the communication with the user, be it via email or via push notifications. Housepedia is currently developing a feature that would enable users to reserve items via in-app payment, thus the name will be required for identification.

   1.2. Email – The email is required for authentication within the application as well as communication. Everything from activation emails, password resets, personal information data communication, news, updates, changes to the Housepedia system, or important relevant information concerning your account would be communicated via email. Housepedia may send occasional marketing emails concerning listings on the application or other relevant opportunities. Under no circumstances will your email be shared with any third party.

   1.3. Facebook or Google ID – The collection of these identifiers for the user's account are required only when Google or Facebook authentication is used.

   1.4. Localization – Location (defined by latitude and longitude) is used in order to determine the location of the user and the (initial) area of interest as well as to serve relevant listings in the vicinity or area of interest of the user. Localization is also required for ensuring the user receives listing recommendations from the correct service. Housepedia functions in multiple countries so listings, currencies and application settings must be delivered in a relevant and localized manner.

   1.5. IP address and IP address history – The Internet Protocol Address collection has two purposes: one is for localization in case localization services are unavailable or do not function properly, and the second is for identifying and preventing system abuse.

   1.6. List of all listings viewed by the user, including actions made on each listing such as seeing the full text, seeing the images, sharing the listing, contacting the agent, adding to or removing from favourites – This information enables Housepedia to identify user interests and send specific, relevant notifications on recommended listings that may be of interest to the user. It also helps in establishing what listings are the most popular.

   1.7. Mobile device-related information: application token, operating system, screen resolution – This information is gathered for statistical purposes as well as debugging situations. It enables the team

to understand the usage of the app better, the direction of development, and to identify potential development or design issues.

1.8. Application usage location history, both user locations and area of interest on the map – In order to provide the best suited listings at the best possible times, without annoying our users, location history is preserved. It also enables Housepedia to identify locations of interest that can be addressed by our service.

1.9. Initiate call - this is used in order to allow the user to call directly from the application the owner/ real estate agent that published the listing.

2. On the 25th of May 2018, the EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the **DPD**) (also known as the General Data Protection Regulation) (the **GDPR**) will enter into force; and as a result, Housepedia Inc and Housepedia Tech Services SRL are making all reasonable efforts to ensure they comply with it. When processing personal data in relation to this agreement, Housepedia Inc and Housepedia Tech Services SRL undertake to comply with the applicable personal data protection legislation, including, but not limited to: the GDPR, its implementing legislation, and the decisions that the European and Romanian supervisory authority (ANSPDCP) may from time to time issue in relation thereto.

3. In the sense of the GDPR, a controller is the entity which, alone or jointly with others, determines the purposes and means of the processing of personal data, while a processor is the entity which processes personal data on behalf of the controller. In this sense, Housepedia Inc and its subsidiary, Housepedia Tech Services SRL, as service providers, are both controllers and processors.

4. The Opinion 1/2010 of the Article 29 Data Protection Working Party on the concepts of "controller" and "processor" under the DPD adopted on 16 February 2010 (00264/10/EN, WP 169) (**Opinion 1/2010**), insofar relevant under the GDPR, contains definitions of the concept of "controller" and "processor" equivalent to those in the DPD. Housepedia Inc and Housepedia Tech Services SRL take Opinion 1/2010 into account when allocating responsibility in relation to the processing of personal data for providing its service.

5. Housepedia may disclose personal data to its employees or representatives in charge with the performance of its service. Such data items may consist of: identification data, position, telephone, and email address of the relevant user / customer.

6. Where required under the law, when Housepedia Inc or Housepedia Tech Services SRL will be disclosing information in relation to its users, they shall provide a privacy notice to the data subjects, adequately informing them of the processing of their personal data carried out in connection with its service and the other entities' interest.

7. At any time, the user may request access to its own data the Housepedia system stores. This data can be viewed by downloading a private user data report from a personalized link received via email upon request within the application.

8. At any time, the user may request the deletion of any identifiable information from within the Housepedia system, acknowledging that by doing so, the system will not be able to provide its complete service range to the user. Restoring deleted information is not possible; and in order to gain access to the service's complete range, a new user account must be created. Any personalization and history would be lost.

9. The user can change his / her personal identifiable information, like name or email, either by using the "My Account" features in the Housepedia client application, either by sending an email to support@Housepedia.co.

10. List of third parties (other than Housepedia clients) with whom personal information may be shared. With respect to the column titled, "Purpose", each third party is carrying out the purpose to fulfil obligations which Housepedia has contracted with the entity to fulfil, and while the data subject information is not directly provided, said party may have access to it through the service it provides (access to the cloud, communication through its platform etc).

Category	Party Name and Jurisdiction (in brackets)	Purpose	Data Disclosed
Operational services	Google, Inc. (USA) IBM (USA) SoftLayer Technologies. Inc. (USA) DigitalOcean, LLC (USA)	To provide cloud-based hosting, storage and processing services to assist and/or enable Housepedia to manage users' Account Information as well as data generated through their use of Housepedia Services and deliver, analyse and improve Housepedia Services.	All Account Information, data generated through the use, and/or necessary for the provision of, Housepedia Services and, more generally, all information referred to in the Personal Data Protection Agreement in redacted or encrypted form).
Operational services	Apple, Inc (USA), Google, Inc. (USA)	Mobile push notification delivery service	Anonymous device ID to which the notification is being delivered
Marketing and Public Relations	Google Inc., Google Ireland, Ltd. (Ireland), Google (SE), DoubleClick Europe Ltd (UK), DoubleClick, a division of Google, Inc	Help identify behaviour on Housepedia websites and the mobile apps in order to guide decision about targeted marketing; to help efficiently handling and optimising desktop and mobile campaigns and elsewhere in the web and execute retargeting campaigns in order to deliver personalised advertising.	Anonymous ID generated by cookies, pixel tags or similar technologies embedded in webpages, ads and emails delivered to users. Advertising ID and Device ID, encrypted e-mail address, Encrypted Customer ID, Encrypted Merchant ID, Transaction Value.
Marketing and Public Relations	Facebook, Inc (US), Facebook Ireland Limited (Ireland), Twitter, Inc. (US),(Ireland), Facebook Business Manager (SE).	To execute retargeting campaigns in order to deliver personalised advertising.	Advertising ID and device ID to segment user groups based on app behaviour, encrypted e-mail address associated with Housepedia users (without indicating account relationship), IP Address, Anonymous ID generated by cookies, pixel tags or similar technologies embedded in webpages, ads and emails delivered to users. Mobile advertiser ID, IP Address and other metadata via Facebook SDK in mobile apps.

Marketing and Public Relations	Google Inc., Google Ireland, Ltd. (Ireland), Google (SE), DoubleClick Europe Ltd (UK), DoubleClick, a division of Google, Inc	Email communication via the GMAIL service	Email, name
Marketing and Public Relations	MailChimp Inc (USA), SendGrid Inc (USA)	To execute marketing campaigns in order to deliver personalised advertising as well as mass email communication.	Email, name

11. All data is and will be stored securely in the cloud on IBM SoftLayer or DigitalOcean infrastructure. All private user data is encrypted and stored in a secured database. All Housepedia servers are in Europe, in special colocation centres, in Amsterdam and Frankfurt.

12. All Housepedia application data communication is done through a secure channel https (HTTP Secure), the communication protocol encrypted by the Transport Layer Security (TLS 1, 1.1, 1.2). without a fall back to plain http.

In order to use the Housepedia system and benefit of its service, you must agree to the terms.

Check this box to indicate that you have read and agreed to the terms of the Housepedia Personal Data Protection Agreement.

Check this box to indicate that you agree to receive Marketing communication from Housepedia over email. This would include listings similar to the ones that you have shown interest on in the past or other relevant opportunities with the Housepedia system.