Privacy Policy and Personal Data Notice

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WHO WE ARE

We are Flatfy OÜ (Private Limited Company, incorporated under the laws of Estonia, commercial registry code 14147289) and our legal address is: Punane tn 24a, Lasnamae district, Tallinn city, Harju county, 13619, Estonia (hereinafter referred to on this Site as "we" or "us" or "our"). We are the owners and providers of this Site.

INTRODUCTION

We are fully committed to protecting your privacy and personal data. This privacy policy and personal data notice (hereinafter referred to as the "Policy") explains how and for what purposes we use the information collected about you (also referred to as personal data). Please read this Policy carefully. By using this Site and any services we offer via this Site, you agree and consent to the processing of your data as specified below.

This Policy only relates to the personal information that we collect about you from the Site or from third parties such as social media companies. It does not relate to property information provided to
us by our partners.

We effectively aim to minimize the amount of personal data we collect, limiting it only to information that in our opinion is necessary to provide a full user experience of this Site.

We collect and use your personal data only upon your prior explicit, free-given and informed consent given by our request, that will be displayed on our Site.

As a general rule, you will need to give your consent only once. In the event of changes to our Policy regarding personal data, we will definitely inform you about it, and perhaps you will need to give your consent again.

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

**Information you give us:** We will collect the information you give us when using our Site. We may also collect other information about you at the same time, such as details on the type of property you are interested in, the cost and location of the property etc. We may also collect information that you provide us when registering as a registered user (namely – your ID handle and e-mail address), when requesting property email updates. We will also collect information you provide us by corresponding with us by phone, e-mail or otherwise.

**Information we collect about you:** This is different to "information you give us" because it relates to technical data that we collect. So for example, we may collect technical information that can potentially identify you, such as the internet protocol (IP) the address used to connect your device (desktop, tablet, mobile phone, etc.) to the internet, your internet connection, your login information, browser type and version, selected language in browser, browser plugins, time zone setting, browser
plug-in types and versions, operating system and platform, a/b testing and its versions. We may also collect information about your visit, including the full uniform resource locators (URL) clickstream to, through and from our Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number. We may also keep a record of the advertisers or partners you contact and the contents of emails you send them.

**Information we receive about you from third parties:** We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case, when we collect that data, we will inform you that it may be shared internally and combined with data collected on this Site. We are also working closely with third parties (including, for example, social media platforms, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies) and may receive information about you from them.

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**HOW DO WE USE YOUR PERSONAL DATA?**

**Main Uses**

This section of the Policy describes how we use your data in direct regard to your use of the Site and our services. We will use your information as we hope you would expect us to, namely:

- to provide you with services available on our Site;
- when you consent to us doing so, to pass your searches and messages on to our members, which include estate agents, commercial agents, letting agents, developers, landlords or
overseas private vendors to help them communicate with you directly and to provide you with a more personalized service; this may include contacting you about other relevant properties, adding you to their enquiry database for future contact and offering you their additional services;

- to provide services and information to third parties and to our members, which they can use to benchmark their performance;
- to customize and enrich your experience on our Site;
- to allow you to participate in interactive services available on our Site or to participate in competitions or promotions via our Site;
- to enforce our Terms of Use;
- to contact you for your opinion on our services and to occasionally notify you about important changes to our Terms of Use or this Policy or developments to this Site or our services; and
- to deliver relevant advertising to you whilst you are on the Site.

**Technical Uses**

This section of the Policy describes how we use your data and information collected through monitoring this Site while you are using it. We may use this information:

- to identify patterns that we can use in our marketing strategy and to help us develop, administer, support and improve our services, features and adverts;
- to conduct reviews that assist us in improvement and optimization of our Site;
- to ensure that content from our Site is presented in the most effective manner for you and for your computer;
- for our Site’s administration and internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- as part of our efforts to keep our Site safe and secure.

We may combine this technical information with other information we have about you to help us process your information as described in this Policy.

**Uses for Marketing and Communications**

Sometimes we may use your personal information to provide you with marketing messages or allow us or third parties to communicate with you about third party services. We will always seek your consent before doing so and you can opt out of marketing and other communications at any time by contacting us. You can always use the Site without having to agree to marketing. For marketing and communication purposes, we may:

- provide direct marketing advertisements and communications to you via email, text, post or telephone or via our selected third parties;
• make suggestions and recommendations to you and to other users of our Site about products or services that may interest you or them;
• communicate with you on third party social media platforms and share your information therewith;
• provide your information to selected third parties that we believe may be able to offer you products or services you may be interested in, so that they can contact you about their products and services; and
• monitor the effectiveness of our direct marketing communications and your responses thereto.

WHO HAS ACCESS TO YOUR PERSONAL DATA?

We retain access to all personal information that we have collected from you or about you. Once in our possession, we will be responsible for that information and that information will be subject to any privacy terms or policies that we have in place.

If our business is sold or merged, or if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets. We will make sure that any such transfer is done in a secure way.

If we offer or supply a service to you that is provided on our behalf by a third party we may have to pass your information to them in order to deliver the service. By using this Site you consent to us providing your information to the third parties authorised by us to provide such services. We may also use third parties to provide services on our behalf which may include processing (but not using themselves) your information e.g. to complete partial addresses or to augment the information we hold about you. In either case, we will not pass your information to anyone who is not also subject to adequate privacy commitments in our contract with them and we will not allow the third party to
use your information for marketing purposes without your consent.

We also may reveal your personal data to any local or international public authorities, if they have a legal right to ask and obtain such information.

We will not otherwise disclose, sell or distribute your information to any third party without your permission unless we are required to do so by law or to obtain professional advice. We will retain your information for as long as is reasonable and necessary and no longer than permitted by law.

WHERE DO WE STORE YOUR PERSONAL DATA?

The data that we collect from you may be transferred to and stored at a destination inside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or contractors. Territories outside of the EEA may not have legal protections equivalent to those that apply within the EEA, but we are under a duty to make sure that our suppliers and contractors located outside the EEA continue to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. By submitting your personal data to us, you agree to this transfer, storing or processing.

Unfortunately, transmission of information via the internet is not completely secure at the time due to the state of technology involved. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent any unauthorised access thereto.

We follow strict security procedures to ensure that your personal information is not damaged,
destroyed or disclosed to a third party without your permission and to prevent unauthorised access thereto. Computers storing this information are kept in a secure facility with restricted access and we use secure firewalls and other measures to restrict electronic access thereto.

Only employees who need access to your information to perform a specific job are granted access to personally identifiable information. We may require you to cooperate with our security checks before we disclose information to you.

Your Rights

You have all the rights granted to you by applicable law regarding personal data (such as, among others, right to forsake personal data, right to transfer personal data and other guaranteed rights).

Cookies and Tracking

Like many websites, we use "cookies" to enable us to personalize your visits to our Site, simplify the sign-in procedure, keep track of your preferences and to track the usage of our Site. For full details about what cookies we set, why we use them or how you can disable them - please see our Cookie
CHANGES TO THIS POLICY

Any changes we may make to this Policy in the future will be posted on this page and, where appropriate and if deemed necessary, notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to this Policy.