Personal Data Processing Policy

The processing of personal data of the User, based on the personal data processing policy (hereinafter referred to as the "Privacy Policy"), is performed by the Company and/or Third parties named by the Company.

The Users' acceptance to the Terms & Conditions will be deemed to be the written consent to the Privacy Policy.

Providing information to the Company by the User is mandatory, otherwise, the User will not be able to register in the Application and therefore will not be able to receive Service from the Company.

1. Definition of Terms

Unless the context otherwise requires, the terms used in the Privacy Policy have the meaning assigned to them by the Terms & Conditions. In case of collision between the meanings, the meanings outlined in Privacy Policy shall prevail.

2. Personal Data

To provide high-quality Service, the Company collects the following data from Users:

- 2.1. Data provided to the Company by the User (in the case of a Registered User):
 - Data:
 - Mobile Number.
 - E-Mail.
 - Name.
 - Surname.
 - Age.
 - Sex.
 - Bank Card Details.
 - Whether the Registered User is a student.
 - Which university the Registered User is enrolled in.
 - Whether the Register User is a smoker.
 - Whether the Register User has a pet.
 - Additional information that the Registered User provides to the Company on his/her own initiative, in writing and/or orally.
- 2.2. Data that the Company receives independently from the User.
 - IP Address of the User.
 - The browser types and versions used.
 - The operating system used by the accessing system.
 - The date and time of access.
 - The pages of our Application that you visit.
 - Referrer URL (the previously visited page).
 - The type of mobile device you use.
 - User's mobile device's unique ID.
 - The IP address of User's mobile device.
 - User's mobile operating system.
 - The type of mobile internet browser.
 - Unique device identifiers and other diagnostic data.

3. Purpose of the Data Processing

- 3.1. The processing of personal data of the User by the Company and/or a person named by the Company is carried out for predetermined purposes.
- 3.2. The personal data of the User is processed by the Company and/or the person named by the Company for the provision of decent and high-quality Service and the smooth use of the Application.
- 3.3. General purposes for data processing:
 - Improve, refine, and simplify Application usage.
 - Provide the service to the User.
 - Enabling the User to receive and use the Service.
 - Detect/block suspicious/illegal transactions or actions.
 - Prevent fraud and other possible offenses.
 - Compile statistics with maximum accuracy and thus improve the Service.

3.4. Special purposes of data processing:

- By the mobile number, the Company ensures constant contact with the Registered User, informing him/her and, if desired, providing information to other Registered Users. The Company provides the Registered User with updated information, promotions, and other notices/information related to the Service, including for marketing purposes.
- By e-mail, the Company contacts with the Registered User, including in the case when the Registered User is not available on the phone number, or the number no longer exists. Also, through e-mail, the Company ensures the provision of updated and written information, promotions, and other notices/information related to the Service to the Registered User, including for marketing purposes.
- Name & Surname is used for identification of the User.
- Bank Card Details are used for the Service Fee reimbursement.
- The information regarding the universities is processed for the Registered User to be able to benefit from the discount since the Company has /will have different packages for different universities' students.
- Information regarding pets and cigarette smoking is collected by the Company for the purpose of improving the Service and connecting compatible Registered Users.
- Age-related information is used for the Registered Users to find compatible roommates with a minimum age and interest gap.
- 3.5. In the case of Registered Users, data processing is also used for marketing purposes and to offer Service/benefits tailored to the Registered User as much as possible.
- 3.6. The Registered User has the right to request the Company at any time to stop processing data about him for direct marketing purposes.
- 3.7. The Registered User has the right to request the Company to stop processing his/her personal data, however, in such a case, he will no longer receive the Service and the Service Fee will not be returned by the Company.

4. Data Transfer

- 4.1. The Company reserves the right to transfer User data under confidentiality to other persons, for the purposes outlined in this Policy.
- 4.2. In the event of the exercise of the powers provided for in paragraph 4.1, the Company shall provide to an outside person only the information necessary to achieve a specific purpose.

5. <u>Modifications</u>

5.1. Some changes/additions may be made from time to time in Privacy Policy, which shall be automatically reflected in the Application. By using the app, you agree to the above changes and/or additions. In case of significant changes/additions, the Company will inform you about it.

6. <u>Notes</u>

- 6.1. The Company understands the importance of the rules of protection or processing of personal data of each User.
- 6.2. What matters to the Company is the opinion and attitude of each User, including and not only, about the processing of personal data.
- 6.3. The Company expresses its desire and readiness in case of any remarks/advice to understand the complaint made by the User, therefore, if any, please contact: XXXX@roommategeorgia.ge.