

## Privacy Policy

We take your privacy very seriously and are committed to protecting the privacy of all visitors and subscribers to our website or any application we make available via an app store (the “Platform”), and the corresponding services available through the Platform (the “Services”).

Below we set out our privacy policy, which will govern the way in which we process any personal information that you provide to us. We will notify you if the way in which we process your information is to change at any time.

Please read this privacy policy carefully as it contains important information on who we

are and how we collect, store, use and share your information. By accessing the

Platform or using our Services or otherwise indicating your consent, you agree to, and

where required, consent to the collection, use and transfer of your information as set out

in this policy. If you do not accept the terms of this policy, you must not use the Platform

and/or the Services. This privacy policy supplements other notices and privacy policies

and is not intended to override them.

This privacy policy: (i) applies only to the Platform and not to websites or applications of

any other companies or organisations; and (ii) specifically addresses our obligations

pursuant to local law.

The data we collect about you

When you visit our Platform or create a login in and password to access the Services,

you may be asked to provide information about yourself. This may include:

(i) your

name and contact details, including email address and telephone number;

(ii)

information to enable us to check and verify your identity; (iii) location data;

(iv) your

billing information, transaction and payment information and history; and (v)

such other

information as we may from time to time require to provide the Services

and comply

with applicable law. You agree and, where required, consent to the

collection of

information about your usage of the Platform and the Services and

information from

messages and communications you send to us.

This information is required to provide the Services to you. If you do not

provide such

information, it may delay or prevent us from providing the Services.

This privacy policy will also apply when accessing the Platform and/or the

Services from

mobile technology (such as mobile phones, tablets or other devices).

Unless you have

chosen to remain anonymous through your device and/or platform settings,

this

information may be collected and used by us automatically if you use the

Services and

access the Platform from mobile technology.

Calls between you and us, or between you and third parties made through

us (such as

real estate agents you contact about a property through a form or link on

our website, or

using contact information found on our website), may be recorded or

monitored for

quality assurance and customer service purposes. We use third-party service providers to track phone calls and text messages between you and real estate professionals so that we and the real estate professional can access certain details about the contact. As part of this process, we and our service providers will receive in real time and store data

about your call or text message, including the date and time of the call or text message, your phone number, and the content of the text message.

Who we share your personal information with

Your personal information (which includes your name, address and any other details

you provide to us which concern you as an individual) may be processed both by us and

by other companies within our group. Each of the companies in our group authorised to

process your information will do so in accordance with this privacy policy.

We may also share your information with: (i) third parties we use to help deliver our

products and services to you (for example, payment service providers); (ii) other third

parties we use to help us run our business (for example, marketing agencies or website

hosts); and (iii) third parties approved by you (for example, social media sites you

choose to link your account to or third-party payment providers).

We require all third parties to respect the security of your personal data and to treat it in

accordance with the law. We do not allow our third-party service providers to use your

personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We may use or share the information you provide to us if we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or in order to enforce any obligation against you or to protect the rights of us and our affiliates. This may include the exchange of information with other companies and organisations for the purposes of fraud protection and prevention. We may also need to share some personal information with our affiliates, subsidiaries and third parties (such as real estate agents that use the Platform) or during a re-structuring of our business. Usually, personal information will be anonymised but this may not always be possible.

#### Purpose of processing

Your information will allow us to provide you with access to the particular parts of the Platform relevant to you and allow us to supply the Services you require. We will use your information for the purpose of fulfilling service orders placed by you, processing any other transactions authorised or made by you with us, informing you of special offers and providing other marketing information to you which we think you may find of interest, undertaking services or customer research/development. Your information may be used by us to contact you for your opinions on the Platform, the Services and our business, and to notify you of changes or developments to the

Platform, the Services and our business.

## Disclosure of information

In the unlikely event that a liquidator, administrator or receiver is appointed over us or all or any part of our assets that insolvency practitioner may transfer your information to a third-party purchaser of the business provided that purchaser undertakes to use your information for the same purposes as set out in this policy. We undertake not to provide your personal information to third parties save in accordance with this policy.

## Cookies

We may send a small file to your computer or device when you visit our website (a “cookie”). This will enable us to identify your computer, track your behaviour on our website and to identify your particular areas of interest so as to personalise and enhance your experience on this website. We may use cookies to collect and store personal data and we link information stored by cookies with personal data you supply to us. You can set your browser to reject cookies but this may preclude your use of certain parts of the Platform.

If you participate in or enquire about any lead, referral or similar service we may offer, we may use the information you submit, as well as other data we might have or obtain ourselves or from other sources, to determine which of our participating Professional(s)

may be willing, able and/or compatible to serve your needs or possible interests and to assist them or others in doing so. We may forward or share information relating to you, which may include such information as well as personal information obtained through our sign-up form or otherwise, to certain Professional(s). Those Professionals or their affiliates, contractors, advertisers, agents or other designees may use such information and contact you regarding your needs or possible interests, as may we ourselves.

“Professional(s)” means individuals, companies and other organisations or persons acting as real estate professionals or otherwise engaged in a business relevant to the Platform.

Third-party vendors, including Google and Facebook, use cookies to serve ads based on a user’s prior visits to the Platform. Google and Facebook’s use of cookies (in Google’s case, the DART cookie) enables them and their partners to serve ads to users based on their visits to the Platform and/or other sites on the internet. Users may opt out of (i) the use of the DART cookie by visiting the Google website; and (ii) Facebook’s cookies by visiting Facebook’s advertising preferences page.

#### Security measures

We have implemented security policies, rules and technical measures to protect the personal data that we have under our control from unauthorised access, improper use and disclosure, unauthorised destruction or accidental loss.

We also have procedures in place to deal with any suspected data breach. We will notify you and any applicable regulator or authority of a suspected data security breach where we are legally required to do so.

You are solely responsible for keeping your password and other account details confidential. If you have concerns about your password, account details, or are suspicious about any unauthorised use of your account, you should contact us immediately. We can deactivate or suspend your account at any time.

#### Access to information

You may ask us whether we are storing personal information about you by emailing us at [privacy@roomyfinder.com](mailto:privacy@roomyfinder.com) and, if you wish and upon payment of a fee of AED 50, we will provide you with a copy of the personal data we hold about you by email. We may ask for proof of your identity before providing any information and reserve the right to refuse to provide information requested if identity is not established.

#### Data deletion request

You may request that we delete your personal data by emailing us at [privacy@roomyfinder.com](mailto:privacy@roomyfinder.com). We will endeavour to comply with such deletion requests but in certain circumstances we will be unable to delete your personal data as we may be required to retain it for legal, regulatory and/or compliance reasons (and we may not be able to communicate why we cannot delete such data due to confidentiality obligations

that we may be under). We may ask for proof of your identity before deleting any information and reserve the right to refuse to delete information if your identity is not established. We reserve the right to charge a fee in respect of any deletion request.

#### Enquiries

If you have any enquiry or concern about our privacy policy or the way in which we are handling personal data, please contact us at [privacy@roomyfinder.com](mailto:privacy@roomyfinder.com). If at any time you wish us to cease processing your information, please send a message to our admin department and insert "unsubscribe" as the subject heading.

#### Payment Data

We employ a third-party provider for processing credit card payments. They have access to personal information needed to perform their functions but may not use it for other purposes. We do not have access to or retain any of your payment information.

#### Updates to policy

We reserve the right to vary this policy from time to time. Our updated policy will be displayed on our Platform(s), and by continuing to use and access the Platform, following such changes, you agree to be bound by any variation made by us. It is your responsibility to check this policy from time to time to verify such variations.

This privacy policy sets out the basis on which we'll process any Personal Information (as



defined below) we collect from you, or which you provide to us when you register and use our website or our mobile application (collectively, the “Platform”), or any services provided through the Platform (including when you post any adverts on the Platform). Please read the following carefully to understand how we use and protect the information you provide to us.

By browsing and/or using our website and/or our mobile application, or any services offered through the Platform, you’re consenting to our processing of your Personal Information in accordance with this privacy policy as set forth in the Terms and Conditions. Terms not otherwise defined in the Privacy Policy have the same meaning as set forth in the Terms and Conditions.

#### 1. Contacting us

1. When you provide Personal Information to us via the Platform, RoomyFinder, Inc (“we”, “us”, “our”), and in certain instances, as further explained in clause

2.9 below, the applicable third party, will be the data controller in respect of any such Personal Information you submit to us or which we collect from you

when you use our Platform. “Personal Information” means any information relating to a living individual by which such individual may be personally identified. Personal Information may include first and last name, e-mail address, mailing address, telephone number, ID number number and other identifying information. We are a company registered in UAE with file number

6113758 – our trading address is at 234 5th Avenue, #413, New York, NY, 10001. For more information see “about us”;

2. If you'd like to know what information we hold about you, or you have any

other queries or complaints in relation to this privacy policy, our contact details are as follow Roomy Finder, Inc

234 5th Avenue, #413

New York

NY

10001

Email: [customerservices@roomyfinder.com](mailto:customerservices@roomyfinder.com)

Phone: +971 506013921

2. The information we collect from you

1. We collect the information you provide to us when you register on the Platform, including your name, gender, email address and search preferences. We use this information to create a User account for you on our

Platform and to provide our services to you, including publishing your adverts

on the Platform and facilitating introductions with other Users of our Platform.

However, we will not share your email address with other Users of our Platform unless you have specifically chosen to disclose it. Where you have

not opted out of receiving them, we will also use this information to send you

email notifications of other Users' adverts matching your search preferences

and/or newsletters about our own services we think may be of interest to you

from time to time. We will not sell or rent any of this information to any third parties nor send you any third party marketing communications unless you have specifically opted in to receiving them.

2. Any information you include in any advert you post on our Platform will be

collected by us and stored on our servers for the purposes of making the Platform, and the content contained within it, available to our users, and to enable our users to search for and respond to adverts on the Platform.

3. In the event you are asked to submit any sensitive Personal Information as

part of the process for posting adverts on the Platform you'll be asked to tick

a box to demonstrate your consent to our collecting and storing that information and to us making that information available to other users through the Platform.

4. We may also collect information from adverts posted on the Platform on an

aggregated basis for statistical analysis. Some of this data may be used in press releases or shared with third parties on an aggregated basis.

However,

no individual will ever be identified from such data. We don't collect, store or

use any Personal Information contained in any such posts for any other purpose not set out in this privacy policy. Please note that any materials or information you post on our Platform will be visible to other users of the Platform. We therefore advise you to be selective about what information you

include in your adverts and not to include any information you aren't happy to

be publicly available.

5. We may collect any information contained in correspondence between you

and us. For example, if you contact us we may keep a record of that correspondence. We may also ask you for information when you report a problem with our Platform or any content or services made available through

the Platform.

6. We may also collect and store any information contained in communications

between yourself and other Users on the Platform, where such communications have taken place via the messaging system of our Platform.

We do not routinely monitor all communications but we may use software to track communications and we reserve the right to monitor them in order to investigate any suspected breach of our terms and conditions, illegal behavior

or any other misuse of our service or for any other reasonable reason as determined by us from time to time.

7. We may also collect certain information about your visits to our Platform and

how you use the Platform. This may include your IP address, geographical

location, browser type, referral source, length of visit, number of page views

and similar information. We may use this information for a number of purposes, including Platform administration, optimizing the use and performance of the Platform, disclosing to third party contributors or for security purposes. This information may be collected by a third party website

and/or mobile analytics service provider on our behalf and may be collected using cookies. For more information on our use of cookies please refer to section 5 below.

8. We may also collect other information about your activity on the Platform that

is specific to your User account, such as your search history, your search and

account preferences and adverts you have posted. We use this information to

improve your Platform experience and to send you content and messages that are relevant to you. We may use tracking technologies including cookies

to collect this information.

9. In some instances, we may receive some information that you submit to any

third party website and/or mobile application you access from a link contained on our Platform, or where you have logged into our Platform using your profile and account details of a third party website and/or mobile application, such as

Facebook. Both we and the owner or operator of that third party website/mobile application will be the data controller in respect of any such information. You should check the privacy policy of those third party websites/mobile applications to find out how they will collect, track and use your data, including Personal Information.

10. If you choose to register and log in to our Platform using your Facebook profile you are agreeing to share some of the information contained in your Facebook profile with us, such as your age, gender, friends list, your education and work history, your email address and your interests. We may use this information to improve your user experience on the Platform and to match you with other users of the Platform who you are already friends with on Facebook, or who have similar interests or histories to you. If at any time

you would like to request that the information we have received from Facebook is deleted, then please contact us using the contact details that are set out in section 1.2 above.

11. We may also receive Personal Information about you from various third parties. For example, we may receive details such as your mobile number, name, address, email address, network status, customer type, customer role, billing type, mobile device identifiers (IMSI and IMEI) and other subscriber status and device details from your wireless operator via our third party ID verification service provider.

12. If you are a journalist or social influencer, we may receive Personal Information about you, such as your name, email address, job title, place of work, phone number, and social media information from third party providers

of contact databases relating to journalists and social influencers. We may use this information to provide you with information that may be of interest to

you or relevant to you.

### 3. Use of your information

1. We will only use the Personal Information we collect from you in accordance

with this privacy policy. In addition to the specific uses set out in section 2 above, we may use your information for the following purposes:

1. to ensure that content from the Platform is presented in the most effective manner for you and for the device you're using;
2. to send you alerts about adverts that match your search preferences and to let you know when other users of the Platform have expressed an interest in any adverts you have posted to the Platform;
3. to provide you with other marketing communications by post and/or electronic means (such as email, SMS and/or MMS) about our products, services, contests and sweepstakes, events, special discounts and offers, which you have requested to be sent or which we feel may interest you, where you have not opted out of being contacted for such purposes;
4. to send you other general (non-marketing) commercial communications, such as information about the Platform and services provided to you by us at that time;
5. to provide customer service in relation to your use of the Platform, to contact you, to deal with enquiries and complaints relating to the use of the Platform and to notify you about changes to our services;
6. to develop, improve and personalise our Platform in order to improve your experience. We share data with the organisations listed below, which will never share your data with anyone else:
  - Firebase & Fabric - to assist with reducing iOS and Android application crashes and monitoring
  - AppsFlyer - Application usage information and advertising campaign attribution
  - HotJar - to improve website user experience
  - Facebook Analytics - to help us understand our users';

usage and behaviour across our platforms

7. to provide third parties with statistical information about our users – this information will not be able to be used to identify any individual user.

#### 4. Disclosure of your information

1. Other than as expressly set out in this privacy policy or as otherwise required

or permitted by law, we will not share, sell or distribute any of the information

you provide to us without your consent.

2. We may disclose your Personal Information to:

1. a third party, if you have chosen to log on to our Platform by using your profile and account details from that third party's own website or mobile application, such as Facebook;

2. any third party who intends to publish any comments or reviews you've written about our Platform in any medium, including on third party websites or mobile applications, so your comments and reviews can be verified by that third party;

3. any third party to whom disclosure is necessary to enable us to provide you with any services or products that you have requested through the Platform;

4. comply with any court order, law, or legal process, including to respond to any government, regulatory or administrative request and to any person to whom disclosure is necessary or appropriate to enable us to enforce our legal rights, or to protect the rights, property or safety of RoomyFinder, Inc, any company within the same corporate group as RoomyFinder, Inc or our customers or employees or others;

5. any acquirer or potential acquirer of all, or substantially all, of the share capital or assets of RoomyFinder, Inc; and/or

6. other companies within the same corporate group as RoomyFinder, Inc.

3. You should note that the public elements of the Platform, including any

adverts you post on the Platform, will be visible to other users of the Platform

anywhere in the world. You should therefore be careful when submitting information about yourself and only submit information you're happy to be publicly available.

## 5. Cookies and other tracking technologies

1. In common with other websites and mobile applications we use cookies and

other tracking technologies to ensure that you get the most out of the site and

to improve the service we offer. A cookie is a text file containing small amounts of information that are downloaded to your device when you access

a website. The text file is then sent back to the server each time your browser

requests a page from the server. This enables the web server to identify and

track the web browser you are using.

2. Some cookies we use are necessary for our Platform to function properly and

to enable you to move around the Platform and use its features. In addition we also use so called "functional" cookies, which allow our Platform to

remember choices you've made in relation to the Platform, so as to provide a

more personalized and enhanced user experience. Examples of the functional cookies we use on the site, and the information we collect through

the use of those cookies, include those that remember details about your account preferences, including your password and login details, your search

history and adverts you have posted to the Platform, the types of alerts and

newsletters you have opted to receive and the types of adverts you are



interested in hearing about.

3. As mentioned above, we may also use an analytics service provider, such as

Google Analytics, for website and mobile application traffic analysis and reporting. Analytics service providers generate statistical and other information about website and mobile application use by means of tracking technologies including cookies that are stored on users' devices. The information generated relating to the Platform may be used to create reports

about the use of the Platform - the analytics service provider will store this information.

4. In addition, we are also using the following types of cookies/tracking technologies on the Platform:

Google AdWords

Using Google AdWords code, we are able to see which pages helped lead to

registering and, where applicable, upgrading. This allows us to make better use of our paid search budget on Google. You can also choose to opt-out of

AdWords remarketing here.

DoubleClick

We use Google Analytics remarketing codes to log when users view specific

pages or take specific actions on the Platform. This allows us to provide targeted advertising in the future when you browse other websites.

Facebook Pixel

We use the Facebook Pixel to understand how people we advertise to on Facebook, and Facebook partners, interact with our site. The Facebook Pixel

also allows us to identify groups of Facebook users who are similar to groups

of users of the Platform and advertise our services to them. Guidance on how

to opt out is available here.

Google Analytics Demographics and Interest Reporting

These help us better understand who our users are so we can make content

on other channels, such as YouTube, more relevant. You can choose to opt out of these cookies [here](#).

Hotjar

Hotjar provides services including Heatmaps, Visitor recordings, Funnels and

Form Analysis, Feedback Polls and Surveys. The information generated by the tracking code and cookie about your use of the Platform will be transmitted to and stored by Hotjar. Examples of the type of information collected include, but is not limited to, pages visited, how pages are used and

interacted with, type of device and browser used and the country you are in.

You may opt-out from having Hotjar collect your information at any time, see

[Hotjar's privacy policy](#) for further information.

## 6. Turning off cookies or other tracking technologies

1. If you don't want us to install cookies on your devices for these purposes, you

can change the settings on your internet browser to reject cookies. All modern browsers allow you to change your cookie settings. These settings will typically be found in the 'options' or 'preferences' menu of your browser. In

order to understand these settings the following links may be helpful, otherwise you should use the 'Help' option in your browser for more details:

1. Cookie settings in Internet Explorer;
2. Cookie settings in Firefox;
3. Cookie settings in Chrome; and
4. Cookie settings in Safari

2. We recommend you don't turn cookies off when using the Platform as this

may prevent you from using many of the services on the Platform.

However,

please note that if you continue to browse our website or use our mobile application you are consenting to our use of cookies in accordance with this privacy policy.

### 3. How We Respond to Do Not Track Signals

Do Not Track is a privacy preference that users can set in their web browsers.

When a user turns on the Do Not Track signal, the browser sends a message

to websites requesting them not to track the user. At this time, we do not respond to Do Not Track browser settings or signals. In addition, we may use

other technology that is standard to the Internet, such as pixel tags, web beacons, and other similar technologies, to track visitors to the Platform.

Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal.

### 7. Payment information

All payment for any products or services offered through our Platform, including for

any adverts, are made via a secure server provided by our third party payment

processors, currently Stripe, WorldPay and Paypal. We will not collect, store or

process any credit card or other payment information on our own servers.

### 8. Third parties

Third party content, websites, mobile applications, contributors and use of cookies/other tracking technologies.

1. We use third parties including those identified in Clause 5.4 above, other advertisers, ad networks and servers, content providers and application providers who may use cookies and/or other tracking technologies to collect

information, including your Personal Information, about your online activities

over time and across different websites and other online services. Our Platform may contain content and links to other websites and microsites that are operated by third parties. In addition, advertisements contained on our

Platform may operate as links to that advertiser's website, and such advertisers and third parties may also use and place cookies on your devices.

2. We do not control, and accept no liability or responsibility for, these third parties, including third party websites, advertisements, mobile applications and tracking technologies including cookies of such third parties. This privacy

policy does not apply to such third parties, including third party websites, microsites, advertisements, mobile applications and tracking technologies including cookies. Any information such third parties collect by virtue of you clicking on a third party link on our Platform will be collected and used in accordance with the privacy policy of that third party. Please consult the terms

and conditions and privacy policy of those third party websites, mobile applications and microsites to find out how they collect and use your data, including your Personal Information, and to establish whether and for what purpose they use tracking technologies including cookies.

## 9. Security and data retention

1. We employ appropriate technological and operational security measures to

protect against any unauthorized access to or unlawful processing of any Personal Information about you that we hold. We will retain your information

for the period as defined in our data retention policy unless a longer retention

period is required or permitted by law. For the avoidance of doubt, save where your account has been closed for a breach, Personal Information associated with any account on our site will be retained for a maximum period

of 12 months following an account closure. We reserve the right to access this data during this period for the purposes of fraud prevention and/or to investigate any complaints we may receive. In cases where a deletion is not

possible due to legal, statutory or contractual retention periods, or if it requires disproportionate efforts or prejudices your legitimate interests, the information will be blocked instead of deleted.

2. Data transmission over the internet is inherently insecure. Although we employ appropriate technological and organizational security measures to protect your data, including your Personal Information, we cannot guarantee

the security of any data sent over the internet.

#### 10. International data transfers

1. Our servers are hosted in the U.S., however we collect data from wherever

users are situated. The information we collect will therefore be transferred to

the US from any other country in which you may be located. Use of the service constitutes consent to the transfer of your Personal Information to the

United States.

#### 11. Changes to our privacy policy

We reserve the right to make changes to this privacy policy from time to time. Any

such changes to our privacy policy will be posted to our Platform and, if we consider

it to be appropriate, sent to you by e-mail.