

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 & CONDITION** 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.com, ("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, **ABU DHABI**, Business License No. CN-4286642 and registred adress 16, Misakin St, Al Danah, Abu Dhabi 22213. Plot number PRP37696.
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:  
**GLOBAL STRATEGY CATALYST GROUP LLC.**  
401 Ryland St,

Suite 200- A,  
RENO – NV,  
89502.

Email:

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

Phone: [+971 506013921](tel:+971506013921)

## 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, and 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 share your email address with other Users of our Platform unless you chosen not to provide us with your email. 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. Yet we will send you any third party marketing communications.

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 advertize 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 advertize 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.



