

## **Rendin Polska Sp. z o.o. Privacy policy**

*This Privacy Policy explains how the Controller processes Users' personal data that it collects when they use the Services available on the Rendin Platform. Please read this document carefully, as the privacy policy is legally binding in respect of the use of our Services.*

### **Definitions:**

**The Controller/Rendin** - RENDIN Polska sp. z o. o. with its registered office in Warsaw, ul. Twarda 18, 00-105 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw. in Warsaw, XII Commercial Division of the National Court Register under the number KRS 0000886037, tax id. number (NIP) 7781341402, National Business Registry Number (REGON) 631249751.

**Platform** - the web-based environment created by Rendin (website, mobile app, rental advertising tool etc.) for managing rental agreements for premises and the associated warranty solution. The Platform is also used to communicate with the Customer and organise the Services.

**Services** - Services - Rendin provides its Users with services related to finding a tenant by allowing them to place an ad on the Platform or to search for a rental offer (in the case of a tenant), verification of the tenant, conclusion of a secure rental agreement electronically, assistance with problems arising from the rental agreement including the possibility of receiving a guarantee amount in the event of non-payment by the tenant.

**Users/Customers** - adults - over 18 years of age - landlords, tenants, rental agreement administrators (e.g. property managers, real estate agents and other authorised representatives) having full legal capacity, who can enter data on the Platform, conclude and manage rental agreements, report incidents relating to problems arising from the rental agreement and exchange information with Rendin.

### **What personal data do we collect and why?**

#### **Types of personal data, purposes and legal basis of processing**

1. Platform users - including those who have neither created an account on the Platform nor concluded a rental agreement through the Platform:
  - 1) Type of personal data
    - a) IP addresses
    - b) other identifiers and information collected by cookies and other similar technologies
  - 2) Purposes and legal basis
    - a) for analytical and statistical purposes, in which case the legal basis for processing is the legitimate interest of the Controller (Article 6(1)(f) RODO) that consists in conducting analyses of activities on the Platform, as well as Users' preferences in order to improve the functionalities used
    - b) for the purposes of potential establishment, investigation and defence of claims - the legal basis for the processing is the legitimate interest of the Controller (Article 6(1)(f) RODO) consisting in the protection of its rights
2. Platform users - who have created an account on the Platform or concluded a rental agreement via the Platform (landlord or tenant).

The personal data that we collect is necessary for the proper provision of the Services including the performance of the rental agreement concluded via the Platform and to comply with our legal obligations. You may choose not to share your personal data, but we may not be able to provide all requested Services or Platform functionalities without it. Rendin records telephone conversations with Users. We will use recordings or messenger chats to provide a better

service and to deal with complaints. If the User does not consent to be recorded on the call, the User may contact Rendin by other means of remote communication. The provision of data for the purposes of performance of the rental agreement and data archiving after termination of the rental agreement is required by law and is necessary for the conclusion of the rental agreement. If You are obliged to provide correct data to conclude a rental agreement.

- 1) Type of personal data
  - a) name and surname
  - b) e-mail address
  - c) phone number
  - d) personal identification no (PESEL)
  - e) residence address
  - f) bank account number
  - g) other data you opt to share with Rendin, photos, camera data, etc.
- 2) Purposes and legal basis
  - a) for the purpose of providing Services related to the maintenance and operation of User accounts on the Platform or the handling of the rental agreement, including email, letter or telephone correspondence - the legal basis for the processing is the necessity of the processing for the performance of the rental agreement, as well as the ability to contact you on an ongoing basis and to answer your questions (Art. 6(1)(b) RODO)
  - b) for the purpose of fulfilling Rendin's statutory obligations, including the performance of our accounting and tax obligations - the legal basis for the processing is the statutory obligation (Art. 6(1)(c) RODO)
  - c) for analytical and statistical purposes - the legal basis for the processing is the legitimate interest of Rendin (Art. 6(1)(f) RODO), consisting in conducting analyses of activities of the Users on the Platform and their preferences in order to improve the functionalities provided
  - d) for the purposes of potential establishment, investigation and defence of claims - the legal basis for the processing is the legitimate interest of the Rendin (Art. 6(1)(f) RODO) consisting in the protection of its rights
3. Users of the Platform, regardless of their status, may wish to receive commercial information from the Controller relating to the Services provided by Rendin or to give their consent to be contacted for marketing purposes. In such case, the personal data indicated by the User for this purpose are processed by Rendin:
  - 1) Type of personal data
    - a) name and surname,
    - b) e-mail address
    - c) phone number
  - 2) Purposes and legal basis
    - a) for the purpose of marketing and selling the Rendin Services involving the sending of commercial information as consented to by the User - based on Article 6(1)(a) of the RODO following the User's voluntary consent to send him/her commercial information related to the Services provided by Rendin and to contact him/her for marketing purposes
    - b) based on Article 6(1)(f) of the RODO, i.e. in order to pursue the legitimate interest of Rendin to potentially establish and assert claims and to defend against claims and protect rights.

Rendin wants to send you information about its Services that we think you might like.

The provision of the data referred to in this point, as well as the consent to be sent commercial information related to the Services provided by Rendin, and to be contacted for marketing purposes, are voluntary and the non-provision of them does not entail any legal consequences.

If you have given your consent to receive marketing information, you can always revoke it later by notifying us on our platform or by sending an email to [info@rendin.pl](mailto:info@rendin.pl).

#### **Data recipients and categories of recipients**

1. We may disclose your personal data in the following circumstances to the third parties indicated below:
  - 1) the data of the prospective tenant will be communicated to the landlord in respect of the verification of the tenant's financial credibility carried out by Rendin with the consent of the tenant. The scope of such data will be the same as that obtained by Rendin from business information services, including information on positive or negative verification of the tenant. With regard to the personal data provided by Rendin to the landlord, the landlord becomes the controller of this data once it is made available to him and solely decides on the purposes and means of processing the data. The landlord is responsible for the lawful processing of the personal data of tenant provided to him/her via the Platform and for fulfilling the legal obligations relating to processing of such data.
  - 2) personal data of the users may be transferred to another entity for processing on behalf of Rendin. This is most often the case when working with a specific service provider (e.g. the provider of data storage, postal, courier, payment, legal, insurance, IT and auditing services) or subcontractor (e.g. a marketing agency). We may also pass on your data to entities affiliated with us in terms of capital or personality. In such a situation, the transfer of data does not entitle other entities to process the data freely, but only to use it for the purposes expressly indicated by us. In any case, the transfer of data does not relieve us, as the Controller, of our responsibility for processing the data.
  - 3) personal data of the Users may be disclosed if an obligation to disclose or share such data arises under generally applicable legislation or in order to enforce or perform our rental agreement with you or to protect the rights, property or safety of Rendin, our Customers or others.

#### **Transfer of personal data of the Users outside the European Economic Area**

The suppliers of the Controller are mainly based in Poland and other countries of the European Economic Area (EEA). Some of the suppliers are based outside the EEA. In connection with the transfer of User data outside the EEA, the Controller has ensured that the providers provide guarantees of a high level of protection of personal data.

In connection with our use of some tools like Zendesk, Pipedrive or Slack, your personal data may be transferred outside the EEA, including to the USA.

You have the right to request a copy of the standard contractual clauses from us by directing your request to the following email address: [info@rendin.pl](mailto:info@rendin.pl).

#### **The duration of personal data processing**

The duration of data processing by Rendin depends on the type of Service provided and the purpose of the processing:

- 1) personal data processed on the basis of Article 6(1)(a) RODO, i.e. on the basis of a separate consent given by the data subjects, will be processed until effectively revoked
- 2) personal data processed on the basis of Article 6(1)(b) RODO, i.e. for the purpose of conclusion and performance of the rental agreements, will be kept, in principle, for no longer than the Term of the rental agreement and, after its termination, for the period needed to handle complaints
- 3) personal data processed on the basis of Article 6(1)(c) RODO, i.e. for the purpose of fulfilling the legal obligations of the Controller, will be kept, in principle, for no longer than the period necessary to fulfil the legal obligations of Rendin, including obligations arising from accounting and financial reporting regulations
- 4) personal data processed on the basis of Article 6(1)(f) RODO, i.e. on the basis of legitimate interest of Rendin, will be processed until the data subject raises an effective objection. The data processed on the basis of Rendin's legitimate interest related to securing or pursuit of possible claims held by Rendin and the defence against possible claims by Users, will be processed for a maximum of 6 years (calculated according to the limitation periods for claims under the Civil Code) from the date of termination of the performance of the rental agreement entered into with the User or termination of the directing of commercial information and marketing contacts to the User, respectively

The processing period may be extended if the processing is necessary for the establishment and pursuit of possible claims or the defence against claims, and thereafter only if and to the extent required by law, and after the expiry of the processing period the data shall be irreversibly deleted or anonymised.

### **What rights do you have in relation to data protection?**

Rendin wants to make sure that you are fully aware of all your data protection rights.

The right to be informed of all purposes, scope and intended processing of your personal data before it is transferred and to consent or object to the processing, that cannot be carried out without your explicit consent.

Each User has the following rights:

1. access - you have the right to request a copy of your personal data from Rendin.
2. rectification - you have the right to request Rendin to correct any data that you believe is inaccurate. You also have the right to request Rendin to complete data that you believe is incomplete.
3. restriction or erasure of data processing - you have the right to request Rendin to erase your personal data, except where the Controller has the right to keep it because of the need to perform a rental agreement, to secure or exercise possible claims or because of legal obligations.
4. object to data processing - you have the right to object to the processing of your data by Rendin, subject to certain conditions.
5. data portability - you have the right to request Rendin to transmit the data we collect to another organisation or directly to you, subject to certain conditions.

6. withdraw your consent to the processing at any time, provided that it is based on your consent. The withdrawal of consent does not affect the processing of your data carried out by us before the withdrawal.

If you would like to exercise any of these rights, please contact us at any time at [info@rendin.pl](mailto:info@rendin.pl). Such request must be digitally signed.

The right to lodge a complaint to the President of the Personal Data Protection Office (Stawki 2, 00-193 Warsaw) if you consider that the processing of your personal data violates the provisions of the applicable law.

For any further information about your personal data, please contact us by e-mail: [info@rendin.pl](mailto:info@rendin.pl).

### **“Cookies” policy**

The “cookies” policy applies to websites operated by Rendin. The Rendin website contains links to other websites. Our policy applies only to our website, so when you click on a link to another website, please read their privacy policy.

### **What are “cookies”?**

“Cookies” are IT data, in particular text files, stored on the Users' terminal equipment for the use of websites. These “cookies” allow the website to recognise the device of the user and appropriately display a website tailored to that User's individual preferences. “Cookies” usually contain the name of the website from which they originate, the duration of their storage on the end device and a unique number. When you use our Services, we may automatically collect data from you using “cookies” or similar technology.

### **What do we use cookies for?**

We use “cookies” to:

- find out how Users of our Services access and use our Services, in order to improve the quality of the Services provided
- adapt the content of the websites to the User's preferences and optimise the use of the websites; in particular, these files allow for the recognition of the Platform User's device and the appropriate display of the website, adapted to the User's individual needs
- compile statistics that help to understand how Platform users use the web pages, making it possible to improve their structure and content
- improve the quality of our website and monitor and manage traffic
- protect our customers and prevent fraudulent activity

### **What cookies do we use?**

The websites use two main types of cookies: session (session “cookies”) and permanent (persistent “cookies”):

- session files are temporary files that are stored on the User's terminal equipment until the User logs out, leaves the website or switches off the software (web browser).
- permanent “cookies” are stored on the User's terminal equipment for the time specified in the parameters of the “cookies” or until they are deleted by the User.

The following types of “cookies” are used within the Rendin websites:

- indispensable “cookies” that enable the use of services available on the websites, e.g. authentication cookies used for services that require website authentication
- “cookies” used for security purposes, e.g. to detect misuse of website authentication
- performance “cookies”, that allow the collection of information about how websites are used
- analytical (web analytics) “cookies” that enable us to better understand how users interact with web content in order to better organise the layout of our website. These allow us to collect information about how visitors use our site, the type of site the users were redirected from, and the number and duration of their visits on our site.

The Rending website uses “cookies” necessary for the correct display of the website and for the purposes listed above.

#### **Do “cookies” contain personal data?**

Personal data collected using “cookies” may only be collected for the purpose of performing certain functions for the User. Such data is encrypted to prevent unauthorised access.

#### **Deletion of “cookies”**

By default, your web browsing software allows “cookies” to be placed on your end device. These settings can be changed to block the automatic handling of “cookies” in your browser settings or to inform you each time they are sent to your device. Detailed information on the possibility and handling of cookies is available in the settings of your software (among others Internet Explorer, FireFox, Opera, Chrome, among others).

What has already been mentioned above “cookies” of our Services provide you with commercial communications based on the historical engagements with our site or advertisements so that commercial messages can be presented to you based on the history of your visits to the website.

If you wish to restrict or block “cookies” on our Website Services or any other website, you can do so by changing your browser settings. For example, you can block all “cookies”, accept only your own “cookies” or delete all “cookies”.

However, please note that some of our Services may not work if “cookies” are blocked or deleted.

#### **Changes to our Privacy Policy**

This Privacy Policy is effective as of 26th June 2023. The policy is kept under review and updated as necessary.