

Urbanr's Website Privacy Policy

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Urbanr Inc. and its subsidiaries (“Urbanr”, “Company” “we” or “us”) respect the privacy of the visitors and/or Users of its primary website at the address <https://www.urbanr.com/> (including its subdomains) and any other Urbanr-related-websites (collectively, the “Site”) (“User” or “you”) and is committed to protect the personal information that its Users share with it, through their use of the Site and/or the Services. We believe that you have a right to know our practices regarding the information we may collect and use when you visit and/or use our Site.

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use at https://urbanr-cdn.azureedge.net/content/docs/legal/Urbanr_Terms_of_Use.pdf (“TOU”), into which this Privacy Policy is incorporated thereto by reference.

1. Your Consent (PLEASE READ CAREFULLY!)

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE, AND/OR BY USING THE SERVICE (AS SUCH TERM IS DEFINED IN THE TOU) YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY (THE “**PRIVACY POLICY**”), INCLUDING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT ACCESS AND USE THE SITE OR SERVICE.

FOR AVOIDANCE OF DOUBT, YOU HEREBY CONSENT TO THE COLLECTION, PROCESSING, TRANSFER AND USE OF YOUR PERSONAL INFORMATION. YOU ALSO ACKNOWLEDGE AND CONFIRM THAT YOU ARE NOT REQUIRED TO PROVIDE US WITH YOUR PERSONAL INFORMATION AND THAT SUCH INFORMATION IS *VOLUNTARILY* PROVIDED TO US.

NOTE: The Site is intended **ONLY** for Users over the age of eighteen (18).

2. Which information we may collect on our Users?

We may collect two types of data and information from our Users:

- a. Non-identifiable and anonymous information (“**Non-personal Information**”). **We are not aware of the identity of the User from whom we have collected the Non-personal Information.** Non-Personal Information is any unconcealed information which does not enable identification of an individual User, and which is available to us while such User is entering into and/or using the Site. Non-personal Information which is being gathered consists of technical information, behavioral information and aggregated information, and may contain, among other things, the activity of the User on the Site, type of operating system, User's 'click-stream' or searches on the Site, type and version of browser, keyboard language, screen resolution, etc.
- b. Personally identifiable information (“**Personal Information**”). **This information may identify an individual or may be of a private and/or sensitive nature.**
 - Users of the Site automatically provide their IP address (or Mac Address) through log files or GPS-based functionality on mobile devices, mainly for geo-location and security purposes as further detailed below. Users who wish to access to the Site through a mobile device and who do not want their device to provide location-tracking information, can disable the GPS or other location-tracking functions on their device, provided their device offers such function.
 - Urbanr may collect Personal Information through the User's activity on the Site. Such information may include, *inter alia*, whether the Tenant pays his rent on time.
 - In addition, Personal Information which is being gathered consists of any personal details provided consciously and voluntarily by the User:
 - Users who are interested in using the Service are required to open an Account wherein they are required to provide their full name and e-mail address and to choose a password.

Landlords are required to provide their bank account details. The User may, but is not required to, provide the following details: home address or photos.

- As part as the Service, Tenants are obliged to fill application forms, wherein certain Personal Information is required. Such information may include, *inter alia*, social security number, driver's license number, date of birth, phone number, past addresses, etc.
 - In addition, Tenants will be required to answer a few questions when submitting the application form regarding their criminal background, prior evictions, filings for bankruptcy, whether they have ever refused to pay rent in due time, etc.
 - Tenants may be required to fill in additional information which may include, *inter alia*, information regarding employment history and current employment details, co-signers, additional income source, etc.
- The Personal Information is collected from details the Users provide in the registration form or any other form (such as the update of the details on your personal Account) on the Site which includes the User's full name, e-mail address and password (we note that we also collect via such forms certain Non-personal Information, namely the User's device type).
- Personal Information may be collected from the details the User may provide us while contacting us via the support e-mail address.
- Users may provide us with Personal Information which may be included in the User Generated Content uploaded to the Site.

In addition, to the extent that you wish to use our Service (which are provided subject to payment of certain fees, as specified in the Site), you will have the option to use certain online payment method which will require you to provide to the applicable Online Payment Processors certain Personal Information (such as, a credit card number and other related billing information). **We will not store such information in our servers.**

For avoidance of doubt, any Non-personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

We do not collect any Personal Information from you or related to you without your approval, which is obtained, inter alia, through your active acceptance to the Terms and the Privacy Policy.

3. How Do We Collect Information on Our Users?

There are three main methods we use:

- We collect information through your entry and/or use of the Site, including through the use of your mobile device.** In other words, when you are using the Site we are aware of it and may gather, collect and store the information relating to such usage.
- We collect information which you decide to provide us voluntarily.** For example, we collect Personal Information which you voluntarily provide when you contact us through our support e-mail at: support@urbanr.com. We may also collect information provided voluntarily by you when you fill out forms or upload applications through the Service. We may gather, collect and store the Personal Information either independently or through the help of our authorized third-party service providers as detailed below.
- We collect information which is provided to us from Landlords,** such as whether you paid your past rent in due time. We may collect Personal Information about you which may be provided to us by Landlords (including past landlords, which may not be Users on the Site) when they handle any materials or documents submitted by you through our Service.

We may gather, collect and store such information either independently or through the help of third-party service providers as detailed below.

4. What are the Purposes of the Collection of Information?

Non-personal Information is collected in order to:

- Use it for statistical and research purposes and for customization and improvement of our Site and Services.

- Enhance the User's experience while using the Site and/or Service and enable future commercial-related services.

Personal Information is collected in order to:

- Provide and personalize our Services to our Users.
- Verify the Users' identity when signing in through their Account.
- Provide Users with updates regarding their activity on our Site, including support, notifications, reminders, and other information requested by the User.
- Notify Users of the status of their applications, payments, etc.
- Be able to contact Users for the purpose of providing them with technical assistance and support.
- Provide the Users with updates about the Company's developments, updates, news regarding the Site and services etc.
- Determine general geo-location information (i.e., country) from which the User's computer is connected to the Internet in order for us to know the general location of our Site's Users as well as in order to safeguard our Site.
- Enable payment through third party Online Payment Processors. **Please note that we do not collect and store credit card or other financial information.**

5. **Sharing Information with Third Parties**

WE MAY SUBMIT ANY INFORMATION FILLED OUT ON THE APPLICATION FORM AND INFORMATION COLLECTED THROUGH THE USER'S ACTIVITY ON THE SITE, AS DESCRIBED ABOVE IN SECTION 2(B), TO FINANCIAL INSTITUTIONS (INCLUDING BANKS) FOR THE PURPOSE OF PROVIDING THEIR SERVICES TO YOU NOT AS PART OF OUR SERVICES. **YOU HEREBY ACKNOWLEDGE AND AGREE TO SUCH TRANSFER OF INFORMATION.**

Urbanr will not share any Personal Information it collects with any third party. Notwithstanding, Urbanr may share Personal Information in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy and/or the TOU, including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to User's support requests; (e) respond to claims that any content available on the Site violates the rights of third-parties; (f) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (g) to protect the rights, property, or personal safety of Urbanr, its Users, or the general public; (h) when Urbanr is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets; (i) to collect, hold and/or manage your Personal Information through Urbanr's authorized third parties service providers (including, as applicable, their affiliates as necessary to provide us with the requested services), as reasonable for business purposes, which may be located in a country that does not have the same data protection laws as your jurisdiction; (j) to store or process your Personal Information through Urbanr's affiliated companies, which may be located in a country that does not have the same data protection laws as your jurisdiction. Urbanr requires its affiliated entities to agree to processing your Personal Information in compliance herewith; (k) pursuant to your explicit approval prior to the disclosure; or (l) cooperate with third parties for the purpose of enhancing the User's experience; (m) the User has provided his express consent for such transfer of Personal Information.

For avoidance of doubt, Urbanr may transfer and disclose Non-personal Information to third parties at its own discretion.

Please Note: Urbanr is not responsible for the interactions of Users who engage each other through the Site, and is not liable for any damage that may result from such engagement. YOU ACKNOWLEDGE AND AGREE THAT YOU ARE SOLELY RESPONSIBLE FOR SHARING PERSONAL INFORMATION WITH OTHER USERS AND THAT YOU ARE DOING SO AT YOUR OWN RISK.

6. **Deletion or Modification of Personal Information**

If for any reason you wish to delete or modify your Personal Information please send us an e-mail with adequate detail of your request to: support@urbanr.com and we will make reasonable efforts to modify or delete any such Personal Information within reasonable time, pursuant to any applicable privacy laws.

Note that unless you instruct us otherwise we may retain and use your Personal Information after termination of your Account for as long as reasonably required for the purposes of which such Personal Information was collected, including without limitation, for future analytics and analysis, in order to comply with our legal or business requirements or obligations and to resolve disputes or to enforce our Terms, and/or enable the User to reinstate his/her Account, all as permitted under any applicable privacy laws.

Aggregate and/or anonymous information derived from your Account and/or use of the Site may remain on our servers indefinitely.

7. Minors

The Site is intended for Users over the age of eighteen (18). Therefore, Urbanr does not intend and does not knowingly collect Personal Information from children under this age. We reserve the right to request proof of age at any stage so that we can verify that minors under this age are not using the Site.

8. Security

We take reasonable measures to maintain the security and integrity of our Site and User information and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. The Personal Information is hosted with reputable cloud-hosting vendors, such as Microsoft Azure Cloud servers which provide advanced strict security standards (both physical and logical). Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use of your Personal Information will never occur. URBANR SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION.

9. Third Party Service Providers

We may be using third party software or service, including Online Payment Processors, in order to collect, host, store and/or process the information detailed herein. Urbanr uses commercially reasonable efforts to engage with third parties that post a privacy policy governing their collection, processing and use of non-personal and personal information. Such software or service include, without limitation, Google Analytics whose privacy policy can be found at: <http://www.google.com/analytics/>; Citibank whose privacy policy can be found at: https://online.citi.com/US/JRS/portal/template.do?ID=Privacy&JFP_TOKEN=2ZTZCDH4; Microsoft Azure Cloud servers whose privacy policy can be found at: <http://azure.microsoft.com/en-us/support/legal/privacy-statement/>; Payeeze whose privacy policy can be found at: <https://developer.payeezy.com/privacy-policy>; Mapbox whose privacy policy can be found at: <https://www.mapbox.com/privacy/>; MailGun, whose privacy policy can be found at: <https://www.mailgun.com/privacy/>; TransUnion SmartMove, whose privacy policy can be found at: <https://www.mysmartmove.com/SmartMove/privacy-policy.page>. However, Urbanr does not control such third party service providers. Please read their terms of use and privacy policies to understand their privacy practices.

10. Links to Third Party Websites

Certain links provided herein permit our Users to leave this Site and enter non-Urbarn sites or services (which may include but shall not limited to Facebook, Instagram, Twitter, Google+, Mapbox, Google StreetView, Google Maps, TransUnion, LinkedIn and Instagram). Urbanr is not responsible or liable for such linked sites and services' privacy practices and/or any other practices. Your access to, use of and reliance upon any such sites, services and content and your dealings with such third parties are at your sole risk and expense. Those linked sites and services are provided solely as a convenience to you. Most of such linked sites and services provide legal documents, including terms of use and privacy policy, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, *inter alia*, in order to know what kind of information they are collecting.

11. Online Payment Processors

Payments are processed via Online Payment Processors (for more information see our TOU). Their terms of use and privacy policies, not ours, govern your use of their services and should provide details about

information they collect about you. It is your responsibility to abide by all the terms specified by these processors (including without limitation, any age restrictions or limitations with respect to payments) and your use of such services is at your own risk.

12. Cookies and Other Tracking Technologies.

When you access or use the Site, Urbanr or our third party service providers may use industry-wide technologies such as “cookies” or other similar technologies which store certain local information on your computer or device or on the Site (“Cookies”), which will allow us to enable, *inter alia*, automatic activation of certain features and make your experience much more convenient and effortless. We or our authorized third party service providers may use both session cookies (which expire once you close the Site) and persistent cookies (which stay on your system until you delete them). Such Cookies included in the Service may store non-Personal Information (such as different pages viewed by a User within the Site). It is easy to prohibit, disable or delete Cookies. Most browsers will allow you to erase cookies from your computer's hard drive or device, block acceptance of cookies, or receive a warning before a cookie is stored. In order to erase or disable the Cookies you may use the settings options of your device or according to the specific instructions provided by the third party service provider's privacy policy and terms of use. However, if you disable or erase cookies, your online experience may be limited. Cookies usually stores only Non-personal Information, such as the web pages you have visited, the duration of your browsing, etc. Urbanr does not control such third party service providers.

13. Direct Marketing

You hereby agree that we may use your contact details you provided us with for the purpose of informing you regarding our products and services (including competitions we may hold from time to time) which may be of interest to you, and to send to you other marketing material, transmitted to the e-mail address you have provided. You may withdraw your consent via sending a written notice to Urbanr by email to the following address: support@urbanr.com or alternatively following the instructions for removing yourself from the mailing list which are available in the e-mail transmitted to you.

14. California Privacy Rights

To the extent applicable, California Civil Code Section 1798.83 permits our Users who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request you may send us an email to info@urbanr.com. Urbanr is only required to respond to one request per User each calendar year.

15. International Data Transfer

We may transfer information collected about you, including Personal Information, to affiliated entities, or to other third party service providers across borders and from your country or jurisdiction to other countries or jurisdictions around the world (all solely for legitimate business purposes). Please note that we may transfer such information to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to such transfer of information.

16. Changes to the Privacy Policy

The terms of this Privacy Policy will govern the use of the Site and any information collected therein. Urbanr reserves the right to change this policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this policy on the homepage of the Site and/or we will send you an e-mail regarding such changes to the e-mail address that you provided us with. Such substantial changes will take effect seven (7) days after such notice was provided on our Site or sent by e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated “Last Revised” date and your continued use of the Site after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by law and without any prior notice.

17. Got any Questions?

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email to the following address: support@urbanr.com.