

# LOCUS | PRIVACY POLICY

## SECTION 1 – Introduction

We are LOCUS B.V. (**Locus**). We offer you access to our mobile application and our web application on which you can manage and rent out your real-estate (collectively, the **Platform**).

We are located at Schokkerspad 12 1081KR Amsterdam, the Netherlands and registered with the Dutch Chamber of Commerce (*Kamer van Koophandel*) under number: 83451625. Our VAT number is 862879401B01.

This is our policy regarding the processing of personal data (in short, the **Privacy Policy**). You can also find this Privacy Policy on <https://www.locus.eu> (the **Website**). This Privacy Policy explains which data we collect and how we use it. In addition, you can read how we store and protect your data and which privacy rights you can invoke. This Privacy Policy applies to our Platform, Website and the services or products we provide (the **Services**). When we refer to **you** in this Privacy Policy, we mean you as a user of our Platform, Website or Services.

We may modify this Privacy Policy. If we substantially modify the Privacy Policy, we shall place a notification on our Website and Platform. In addition, we shall notify registered users in case of a substantial modification via e-mail. If you are not a registered user, we advise you to consult the Website, Platform and this Privacy Policy regularly.

If you have any questions regarding this Privacy Policy or our Services, you can contact us by sending an email to [info@locus.eu](mailto:info@locus.eu) or visit our Website for more information.

## SECTION 2 – Data Collection

We may receive your data in a few different ways. We receive data you directly share with us, for example when you create an account. Sometimes we also collect data ourselves, for example on how you use our Platform. Finally, we may receive data when you use third-party service providers that we facilitate via our Platform.

### SECTION 2 – Data collected by Locus

Below you will read which data we process of each user, the purpose for which we process data and our legal motivation.

You can use our Platform as a Lessor, a Third-Party Advisor or a Tenant:

- a. a **Lessor** means any company renting out real-estate and using our Platform to manage its real-estate;

- b. a **Third-Party Advisor** means a company or person using our Platform to work for or with a Lessor;
- c. a **Tenant** means any person or company that rents real-estate from a Lessor and uses our Platform to manage its rent.

We process the following data of Lessors, Tenants and Third-Party Advisors:

Personal Data	Purpose(s)
<p><i>Account data:</i></p> <ul style="list-style-type: none"> <li>- first and/or last name</li> <li>- email address</li> <li>- phone number</li> <li>- your questions about our Services</li> </ul>	<p>In order to start using Locus, you need to sign up and create an account. We use account data so that you can log in to Locus and we can personalize our Services. We also use your account data to communicate with you about our Services, for example when you've forgotten your password. That way we can help you use our Services and inform you about relevant updates. Your account data can be changed or supplemented at any time in the settings section on the Platform.</p>
<p><i>Content data related to the Services:</i></p> <ul style="list-style-type: none"> <li>- our correspondence with you</li> <li>- your IP address</li> <li>- additional contact data</li> </ul>	<p>We use our correspondence with you so we can help other users with similar requests better and faster. We also use your IP-address to keep our Platform safe and accessible and to analyze your behaviour on our Platform (see also our 'Cookie Statement').</p>
<p><i>Data for marketing purposes:</i></p> <ul style="list-style-type: none"> <li>- email address</li> </ul>	<p>We use your email address to send you our newsletter.</p>

In addition, we process the following data of Lessors only:

Personal Data	Purpose(s)
<p><i>Financial data related to your real estate:</i></p> <ul style="list-style-type: none"> <li>- bank balances</li> <li>- bank account details</li> <li>- bank transactions</li> </ul>	<p>We use financial data related to your real estate, in order to monitor the Tenant's payment obligations for you. By checking the payment obligations of your Tenants, we can help you manage your financial administration regarding your real estate. In addition, we aim to provide you with valuable financial and operational metrics regarding your real estate, by analyzing the performance of your real estate.</p>

<p><i>Payment data:</i></p> <ul style="list-style-type: none"> <li>- payment details such as contact- and credit card details</li> <li>- invoices</li> </ul>	<p>We use payment data to process your subscription. In more detail we, use this data to facilitate payments, send invoices and update our financial administration.</p>
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## SECTION 2 – Legal background

We consider **Personal Data** to be any data relating to an identified or identifiable person, in conformity with the General Data Protection Regulation (the **GDPR**). As an identified or identifiable person to whom the Personal Data relates, you are the **Data Subject** in this context. We process your Personal Data in accordance with the GDPR and all other relevant legislation and regulations in the field of protection of Personal Data, like the Dutch Telecommunications Act (*Telecommunicatiewet*) regarding the use of cookies (the **Relevant Legislation**). We are allowed to process your Personal Data, because we comply with the Relevant Legislation.

We make sure that the processing of your Personal Data is adequate, relevant and limited to what is necessary in relation to the purpose for which the Personal Data is processed. We shall only use your Personal Data for the purposes listed in this Privacy Policy or for compatible purposes. By doing so, we will not use your Personal Data in an unexpected manner. The processing of your Personal Data is based on the following grounds of the GDPR.

### Performance of the contract

We process your account data and payment data in order to fulfill our agreement with you. We need to process this Personal Data so we can provide some of our core Services to you:

- Create an account and give you access to the Services
- Process the subscription of Lessors

### Legitimate interest

For the processing of financial data related to the real estate of Lessors and the content data related to our Services, we invoke our legitimate interest ground. For the legal basis of legitimate interest, an assessment was made on behalf of our interests on the one hand and your interests, fundamental rights and freedoms as the data subject on the other. This balancing test assesses whether your interests should override ours. Processing your Personal Data on the legitimate interest ground is important to us, because it enables us to provide you with high quality Services:

- We can improve our Services based on your feedback. By processing our correspondence with you, we can help other users with similar questions better and faster.

- We use your IP-address to analyze when and how often you visit our Platform. That way we can optimize our Platform for you.
- We analyze the financial performance of your real estate, so we can provide Lessors with valuable feedback. For example, we can give Lessors insight into the financial and operational metrics of their real estate, such as the total rent income and occupancy.

In assessing your risk, we have paid attention to both the quantity and quality of the Personal Data we process. First of all, we do not process a large amount of Personal Data based on our legitimate interest. We only process your IP address, our correspondence with you and additionally the financial results regarding the real estate of Lessors. The Personal Data we process based on our legitimate interest does not concern sensitive data such as identity documents, payment details or medical information. The chance of identity fraud, discrimination or reputational damage in case of a possible data breach is, in our opinion, minimal. The processing of the relevant Personal Data therefore has no, or only a limited, impact on your privacy.

The conclusion of this assessment is that in our opinion Locus may use 'legitimate interest' for the processing of Content Data. However, this assessment is subjective. Do you disagree with the processing of your Personal Data based on our legitimate interest? Then you can always object to this. We will then reassess, and possibly discontinue, the processing of your Personal Data.

### **Consent**

We request your consent to process your Personal Data for certain purposes and you are entitled to withdraw your consent at any time. We ask your consent:

- For collecting and processing financial information related to the real estate of Lessors, provided by Nordigen.
- To send marketing communication and advertising messages

### **Legal obligations or to establish, exercise or defend legal claims**

We may process Personal Data if we are required to do so by law, for example in the context of a legally valid and binding legal action by a law enforcement agency to obtain certain data. In addition, we may be required to process data to establish, bring or defend civil or criminal claims in connection with actual or potential litigation, for example to protect our Services, our property or other legal rights, including those of our members or partners.

## **SECTION 3 – Data Protection**

We do our utmost to protect your Personal Data from being lost, destroyed, abused, altered or spread by unauthorized parties. This way we ensure that only the necessary persons have access to your Personal Data. We ensure this by taking the following (security) measures:

- Encryption (encoding) of digital files containing Personal Data;
- Secure network connections with Transport Layer Security (TLS) technology, or a similar technology;
- The access to the Personal Data is strictly limited to the employees on a *'need to know'* basis;
- Access to the Personal Data is secured with a two-factor authentication (2FA);
- Use of JSON Web Tokens (JWT), an URL-safe method to secure the exchange of claims between Locus and you;
- Non-disclosure agreements (NDA's) & back-ups

We constantly check our security measures for effectiveness and, if necessary, adjust our process. This way, your Personal Data are always protected and accessible in the event of a (technical or physical) failure.

Finally, we also facilitate the ability for users to log in to our Platform via through Face ID, provided by Apple. Face ID data is encrypted, doesn't leave your device and is never backed up to iCloud or anywhere else. Therefore, Face ID data is securely protected by Apple. For more information, you can visit the website [Face ID & Privacy](#) from Apple.

## **SECTION 4 – Data Storage**

We maintain your Personal Data for as long as necessary to provide our Services to you. We delete your Personal Data after we no longer need them:

- We will retain the payment data of Lessors for a period of 7 years, to meet our financial and tax requirements and obligations;
- We will retain your account data until the end of the contract, or until your account is deleted;
- We will retain your Content Data for as long as necessary to provide you with our Services in an integrated and continuous manner.
- We will retain the financial information, related to the real estate of Lessors, until we have assurance whether the Tenant has fulfilled their payment obligations.

If you want to view, export or delete your Personal Data, please send us an e-mail. We will try to act upon your request as soon as possible. After you request deletion of your account, we will permanently and irreversibly delete your Personal Data from our systems, including back-ups. We may ask for additional Personal Data when deletion requests are made, to comply with the law and take other legally permitted actions.

## **SECTION 5 – Data Sharing**

### **Processors**

We may share your Personal Data with third parties that provide Services to Relive. These are Processors within the meaning of the Relevant Legislation. Processors are given access only to the Personal Data they need to perform these limited tasks on our behalf and are obligated to protect and safeguard your Personal Data. In addition, we agree with Processors that they will handle your Personal Data with care. We might share the following Personal Data with Processors:

- Cloud and hosting providers – we might share your contact data, payment data, content data and financial information related to the real estate of Lessors, for the storage and hosting of our Platform.
- Technical support – we might share your contact data, payment data, content data and financial information related to the real estate of Lessors, for developing and optimizing our Platform.
- Payment providers – we might share the payment data of Lessors for the execution of payment services.

### **Third parties**

Locus facilitates the opportunity for Lessors to connect their bank account to the third-party services of Nordigen. When you authorize Nordigen to access your Personal Data, the use of your Personal Data by Nordigen is governed by the relationship between you and Nordigen (e.g.: their terms and conditions and privacy policy). Locus is not responsible for how Nordigen processes your Personal Data.

It is possible for Lessors to create a Sub-Account for Third-Party Advisors to access our Platform. Therefore, Lessors may give Third-Party Advisors access to Tenants' Personal Data through our Platform. We would like to remind Lessors that it is their own responsibility to ensure that you make agreements with these parties regarding the privacy of Tenants.

### **Other**

If we have a legal obligation to share your Personal Data, we will do so. This is the case, for example, if a public authority legally requires us to share your Personal Data.

### **Transfer**

We shall process your Personal Data within the European Economic Area (**EEA**) to the extent possible. We will only process your Personal Data outside the EEA if that country offers an appropriate level of protection for your Personal Data. For the transfer of Personal Data we use, where appropriate, standard contractual clauses (SCC) approved by the European Commission. We

shall never transfer your Personal Data to countries or parties other than those mentioned above without your consent.

### **Links**

Our Platform may contain links to other websites. We are not responsible for the content or the privacy protection on these websites. Therefore, we advise you to always read the Privacy Policy of those websites.

## **SECTION 6 – Privacy Rights**

You have the following rights:

- **Right of access** - you can request access to your Personal Data.
- **Right to rectification** - you can request us to correct, limit or delete your Personal Data. You can also edit your profile via the Platform.
- **Right to data portability** - you can request a copy of your Personal Data. We can provide this copy to third parties at your request.
- **Right of objection** - you can object to the processing of your Personal Data.
- **Right to object** - you can file a complaint at the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) if you are of the opinion that we wrongfully process your Personal Data.
- **Right to withdraw consent** - you can always revoke your consent to the processing of your Personal Data, by withdrawing your consent to the relevant functionality (such as disconnecting your bank account from Nordigen).

## **SECTION 7 – Cookies**

A cookie is a small text file that can be sent via the server of a website to the browser. The browser saves this file to your computer. Your computer is tagged with a unique number, which enables our site to recognize that computer in the future.

We use cookies to improve the user experience on our Website and Platform. Moreover, cookies ensure that our Website and Platform work faster, that you can visit our Website and Platform safely and that we can track and solve errors on our Website and Platform.

You can always delete or disable cookies yourself via the browser settings. No more cookies will be stored when you visit our Website or Platform. However, please note that without cookies, our Website and Platform may not function as well as it should. For more information, you can read our Cookie Statement.