

Nomad's Privacy Policy

Nomad respects your privacy and is committed to protecting your Personal Data. This Privacy Policy will inform you as to how we look after your Personal Data when you visit our Platform (regardless of where you visit it from) and/or use our Services.

Please use the Definitions below to understand the meaning of some of the terms used in this Privacy Policy. Unless specifically defined, any capitalized terms used throughout this Privacy Policy (but not defined herein) shall have the same meaning attributed to it in Nomad's General Terms and Conditions. Please read this Privacy Policy carefully before using the Platform or submitting any information to us. If you do not agree to any part of this Privacy Policy, you shall immediately cease from accessing our Platform or using any of our Services.

Definitions:

- a. **"Comply with a legal or regulatory obligation"** means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- b. **"Data"** means personal and non-personal User's data that is submitted, generated, featured and displayed through the Platform, collected from the use of the Service and stored on Nomad's servers.
- c. **"Legitimate Interest"** means the interest of our business in conducting and managing our Services to enable us to give you the best Service and the best and most secure experience. We consider and balance any potential impact on you and your rights before we process your Personal Data for our legitimate interests.
- d. **"Nomad's General Terms and Conditions"** means all of the terms, conditions and notices contained or referenced in Nomad's General Terms and Conditions and all other Nomad rules, policies available at <https://public.nomadhomes.co/nomad-terms-and-conditions>, as amended from time to time.
- e. **"Performance of our Services"** means processing your Data where it is necessary for the performance of our Services.
- f. **"Personal Data"** means information that specifically identifies an individual (such as a name, address, photo, telephone number, mobile number, e-mail address, birthday, office location, professional and personal interests, company name, title department, spoken languages) or information about that individual that is directly linked to personally identifiable information.
- g. **"Platform"** means any online tool provided, processed and/or maintained by Nomad (including, but not limited to, through Nomad's website, all subpages and subdomains, all Content, Services, and products available at or through the Platform located at <http://nomadhomes.co/> and/or <http://thenomadhomes.com/> or any related domain or any mobile application offering access to, or facilitating the provision of, the Services);
- h. **"Property"** means any real estate property that is listed on the Platform for sale and/or rent through the Platform;
- i. **"Privacy Policy"** means all of the privacy policies, practices and notices contained or referenced in this document (as amended from time to time) and all other Nomad rules, policies available on the Platform that may be published from time to time on the Platform.
- j. **"Service"** means the online and/or offline services, provided by Nomad for the provision and use of the technology that Nomad has developed to facilitate the access of Buyers and Tenants and to Agents and Agent Services, including without limitation, providing access to Nomad's online community and communication tools

- k. “User”, “you” and “your” collectively mean the person, company, or organization that has visited or is using the Platform and/or the Service. A User may be, without limitation, a Buyer, a Tenant, both or neither.

1. Important information and who we are

1.1 Purpose of this Privacy Policy:

This Privacy Policy aims to give you information on how Nomad collects and processes your Personal Data through your use of the Platform, including any Data you may provide through the Platform when you register an Account, use any Service and/or sign up to our newsletter, as well as installing and signing up to any Nomad mobile application.

Our Platform is not intended for children (persons under the age of 16) and we do not knowingly collect Data relating to children.

This Privacy Policy applies to the Platform and the website you are currently viewing. By clicking on the “Accept” button, you (i) agree irrevocably and without condition to this Privacy Policy, and (ii) consent to your Personal Data being collected, used and disclosed as set out in this Privacy Policy.

You consent to us posting and using any photographs, content and/or Personal Data you might upload on our Platform or have otherwise provided consent to publish on our Platform, blog, in our marketing material or social media channels, which we may use in order to provide information on our Services and/or products, the marketing of our Services and/or products or for the purpose of our functions and/or activities.

It is important that you read this Privacy Policy together with the Nomad’s General Terms and Conditions available at <https://public.nomadhomes.co/nomad-terms-and-conditions>. which may be amended from time to time, and any fair processing notice we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your Data. This Privacy Policy supplements the other notices and is not intended to override them.

If you are a resident of the European Union, you may be protected by and enjoy additional rights under the European Union’s General Data Protection Regulation 2016/679, also known as GDPR.

1.2 Changes to the Privacy Policy and your duty to inform us of any changes in your Personal Data.

You agree that Nomad may amend this Privacy Policy from time to time, and in Nomad’s sole discretion. Although we will use our best endeavors to notify you of any amendment to this Privacy Policy, we will not be required to provide you with prior notification of such amendments or changes to this Privacy Policy.

Upon any amendment or change to this Privacy Policy, we will publish the amended Privacy Policy on the dedicated link available at our Platform. Your continued use of the Platform and/or the Service after the publication date of a revised version of this Privacy Policy constitutes your acceptance of its terms.

You agree and undertake to review our Privacy Policy each time you visit our Platform and/or prior to your use of any Services. If you do not agree to our Privacy Policy, as updated from time to time, you undertake to cease using our Platform and/or Services immediately.

Please note that it is crucial to the Performance of our Services and correct working of the Platform that the Personal Data we hold about you is accurate and current. Please keep us informed and updated if your Personal Data changes during your relationship with us.

1.3 Third-party links

Our Platform may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share Data about you. We do not control these third-party websites, plug-ins and applications, whether or not they operate on top of the Platform or on an external website, and are not responsible for their privacy statements. When you engage such third-party website, plug-in or application, whether or not you have also left our Platform, we encourage you to read the privacy policy of each website, plug-in or application you visit or engage.

2.The data we collect about you

2.1 What Is Personal Data?

2.1.1 Depending on which of our Services you use and how you interact with our Platform, we collect different kinds of information from or about you. We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- a. **Identity Data** includes first name, last name, address, username or similar identifier, title, date of birth and gender.
- b. **Contact Data** includes billing address, delivery address, location, email address and/or telephone numbers.
- c. **Payment Data** includes bank account and payment card details, payment history.
- d. **Transaction Data** includes details about payments to and from you.
- e. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, make and model (mobile phones only), operating system, hardware version, platform, device settings and other technology identification on the devices used to access our Platform, file and software names and types, device identifiers, time zone setting and location, device locations such as through GPS, Bluetooth or WiFi signals, browser plug-in types and versions, operating system and platform, connection information such as the name of your mobile operator or ISP, browser type, language and time zone, mobile phone number and IP address.
- f. **Profile Data** includes any User profile information, any User's username and password, any purchases or orders made by a Client, your interests, preferences, feedback and survey responses.
- g. **Property Data** includes any information about Properties that you may wish to buy, sell or lease, including Property photos, Property location (tower name, community, and geographical coordination), building amenities (shared pool and gym), Property metadata (build date, elevator count and floors), apartment amenities (walk-in closet, air condition), apartment metadata (square footage or flooring) and previous transaction history.
- h. **Usage Data** includes information about how you use our Platform, products and services and how you use your devices to access our Platform, including the screens you visit and searches you make.
- i. **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences
- j. **Other Data** includes:

- i. photos or other data uploaded onto any part of our Platform by you or shared with other Users of our Platform by you via our Platform;
- ii. communications with us via social media platforms, email, electronic messages and other electronic and non-electronic communications;
- iii. third party partner information related to how you use our third-party partners, such as your reviews of our merchant partners or other service providers.
- iv. your networks and connections made available to us, depending on the permissions you have granted, from your mobile and desktop devices' address book contacts, and other social media such as Facebook, Instagram and Twitter.

2.1.2 We also collect, use and share aggregated Data such as statistical or demographic Data for any purpose. Aggregated data may be derived from your Personal Data but is not considered Personal Data as this Data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Platform feature.

2.1.3 We do not collect any Personal Data about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, or genetic and biometric data. Nor do we collect any information about criminal convictions and offenses.

2.2 What Personal Data Do We Collect?

2.2.1 Personal Data You Provide Us With: We receive and store any information you enter on our Platform or that you provide us with in any other way. The types of Personal Data collected may include your name, address, telephone number, mobile number, e-mail address, birthday, office location, residential address, professional and personal interests, company name, title department, your biography and specialist topics, use information regarding your use of our Service and Platform, and browser information.

The Personal Data you provide is used for purposes such as allowing you to set up an Account and/or complete a Property Profile, improving the content of the Service, generating Data products and services including pricing calculators, recommended listings, and machine-generated Property valuations, answering to customer support or technical questions, customizing the advertising and content you see, and communicating with you about the Properties and our new features. We may also draw upon this Personal Data in order to adapt the Services of our community to your needs, to research the effectiveness of our network and Services, and to develop new tools for the community.

2.2.2 Information Collected Automatically: When you use the Service, Nomad automatically receives and records information on our server logs from your browser or mobile platform, including your location, IP address, cookie information, and the page you requested. We treat this data as non-Personal Data, except where we are required to do otherwise under applicable law. Nomad only uses this Data in aggregate form. We may provide aggregate information to our partners about how our customers, collectively, use our site, so that our partners may also understand how often people use their services and our Service.

2.2.3 If you fail to provide Personal Data: Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that Personal Data when requested, we may not be able to perform our Services. In this case, we may have to cancel the Service which you have with us, provided that we will notify you if this is the case at that time.

3. How is your Personal Data collected?

We use different methods to collect Data from and about you including through:

- a. From the information you provide to us when you meet us;
- b. From information you provided to us by your company;
- c. When you communicate with us in writing, by telephone, fax, email or through the Platform or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;
- d. When you complete a registration or other forms;
- e. When you register an Account with our Platform;
- f. From publicly available sources or from third parties, most commonly where we need to conduct background checks about you;
- g. Direct interactions. You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, and email or otherwise. This includes Personal Data you provide when you:
 - i. apply for our Services;
 - ii. create an Account on our Platform;
 - iii. subscribe to our Service or publications;
 - iv. enter a competition, promotion or survey;
 - v. entering data for installing or using any Nomad powered application;
 - vi. correspond with us (online or offline including via email addresses and phone numbers), if you contact us;
 - vii. post Content on our Platform; or
 - viii. give us feedback and review.
- h. Automated technologies or interactions. As you interact with our Platform, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- i. Third parties or publicly available sources. We may receive Personal Data about you from various third parties and public sources as set out above.
- j. Technical Data from the following parties:
 - i. analytics providers such as Google;
 - ii. advertising networks/agencies and
 - iii. search information providers.
- k. Contact, Financial and Transaction Data from technical and payment providers; and
- l. Identity and Contact Data from publicly available sources.

4. How do we share your information?

4.1 Information shared with everyone in the community: We may publicly share some of your Property Data in order to perform our Services.

4.2 Information shared with Agents: If you use our Platform (creating an Account through our Platform or otherwise), we may share your name, phone number, location, email address, and Property Data with the respective Agents in order to perform our Services.

4.3 Partners: We enter into relationships with a variety of businesses and work closely with them. In certain situations, these businesses may sell items or provide promotions to you through Nomad's Service.

4.4 Business Transfer: In the event that Nomad is involved in a merger, acquisition, reorganization, sale of assets or bankruptcy, your information may be sold or transferred as part of that transaction. The promises in this Privacy Policy will apply to your information as transferred to the new entity.

4.5 Protection of Nomad and Others: We may release Personal Data when we believe in good faith that release is necessary to comply with the applicable laws; enforce or apply Nomad Terms and Conditions and other agreements; or protect the rights, property, or safety of Nomad, our employees, our Users, or others.

5. How we use your Personal Data

5.1 We will only use your Personal Data when the law allows us to.

5.2 Most commonly, we will use your Personal Data in the following circumstances:

- a. Where we need in order to perform our Service.
- b. Where it is necessary for our Legitimate Interests (or those of a third party), and your interests and fundamental rights do not override those interests.
- c. Where we need to comply with a legal or regulatory obligation.

5.3 Purposes for which we will use your Personal Data:

5.3.1 Performance of our Services

- a. We process your Personal Data because it is necessary for the performance of our Services. In this respect, we use your Personal Data for the following:
 - i. To assist with preparation of a Confirmation Order;
 - ii. To answer any questions you may have;
 - iii. To deal with any complaints or feedback you may have;
 - iv. To develop machine learning based tools to better serve you;
 - v. To issue reports/analytics on a no name basis for business and marketing purposes; and
 - vi. For any other purpose for which you provide us with your Personal Data.
- b. In this respect, we may share your Personal Data with or transfer it to the following:
 - i. Subject to your consent, third parties whom we engage to assist in delivering the Services to you, including Agents and other third parties;
 - ii. Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
 - iii. Debt collection agencies where it is necessary to recover the money you owe us;
 - iv. Other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you;
 - v. Our data storage providers; and
 - vi. Your agents, advisers, intermediaries, and custodians of your assets who you tell us about.

5.3.2 Legitimate interests

- a. We also process your Personal Data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of another person. In this respect, we use your Personal Data for:
 - i. The administration and management of our business, including recovering the money you may owe to us, and archiving or statistical analysis;
 - ii. Seeking advice on our rights and obligations, such as where we require legal advice. In this respect, we will share your Personal Data with our advisers or

agents where it is necessary for us to obtain their advice or assistance and with third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business.

5.3.3 Legal obligations

- a. We also process your Personal Data for our compliance with a legal obligation which we are under. In this respect, we will use your Personal Data for the following:
 - i. To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws;
 - ii. As required by tax authorities or any competent court or legal authority. In this respect, we will share your Personal Data with the following:
 1. Our advisers where it is necessary for us to obtain their advice or assistance;
 2. Our auditors where it is necessary as part of their auditing functions;
 3. With third parties who assist us in conducting background checks;
 4. With relevant regulators or law enforcement agencies where we are required to do so.

5.3.4 Marketing

- a. We may send you marketing about the Services we provide which may be of interest to you, as well as other information in the form of alerts, newsletters and invitations to the events or functions which we believe might be of interest to you or in order to update you with information (such as legal or commercial news) which we believe may be relevant to you. We may communicate this to you in a number of ways including by post, telephone, email or other digital channels.
- b. You have the right to withdraw/unsubscribe your consent to marketing emails/newsletters at any time by contacting us.

5.3.5 Promotional offers from us

- a. We may use your Identity Data, Contact Data, Technical Data, Usage Data and Profile Data to form a view on what we think you may want or need, or what may be of interest to you, either manually or by the use of digital information systems. This is how we decide which Services, and offers may be relevant for you. You may receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

5.3.6 Third-party marketing

- a. We will get your express opt-in consent before we share your Personal Data with any company outside Nomad for marketing purposes.
- b. You can ask us or third parties to stop sending you marketing messages at any time by logging into the Platform and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time at contact@nomadhomes.co.

5.3.7 Cookies

- a. Our website uses web technologies such as cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.
- b. We use the following cookies:
 - i. Strictly necessary cookies. These are cookies that are required for the operation of our Platform. They include, for example, cookies that enable you to log into secure areas of our Platform or make use of e-billing services.
 - ii. Analytical/performance cookies. They allow us to recognise and count the number of Users and to see how Users move around our Platform when they are using it. This helps us to improve the way our Platform works, for example, by ensuring that Users are finding what they are looking for easily.
 - iii. Functionality cookies. These are used to recognise you when you return to our Platform. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
 - iv. Targeting cookies. These cookies record your visit to our Platform, the pages you have visited and the links you have followed. We will use this information to make our Platform and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
- c. You can set your browser to refuse all or some browser cookies or to alert you when our Platform sets or accesses cookies. If you disable or refuse cookies, please note that some parts of our Platform may become inaccessible or not function properly.

5.3.8 Change of purpose

1. We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Data Security

6.1 We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

6.2 We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

7.1 How long will we use your Personal Data?

We will only retain your Personal Data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of

your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances, we may anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

7.2 Can I ask that my Personal Data be deleted?

You may request at any time that we delete your Personal Data, however this will remain at our discretion. Please note that deletion of your Personal Data may mean that we are unable to perform our Services and that we may have to cancel the Service which you have with us, provided that we will notify you if this is the case at that time.

8. Questions?

If you have any questions or need to contact us regarding our Privacy Policy or anything set out above you may contact us at contact@nomadhomes.co.

Effective as of June 12, 2020