

# **PRIVACY POLICY**

## **Rooms Against Covid**

Last Updated: 20th March 2020

Date of entry into force: 21st March 2020

### 1. INTRODUCTION

Rooms Against Covid was a project created and developed by volunteers within the #tech4Covid19 movement. Rooms Against Covid is part of the broader initiative TechForCovid19, launched in 48 hours by 120 startups and different tech companies in Portugal, supported by the work of a continuously growing base of volunteers of different backgrounds

This Privacy Policy is in accordance with everything that is not contradictory to the Terms and Conditions available (<https://tinyurl.com/vzc4vty>) and describes how we collect, use and/or process your personal data, following your access to and use of the Rooms Against Covid Platform.

#### 1.1 Definitions

If you see an undefined term in this Privacy Policy (such as “Listing” or “Rooms Against CovidPlatform”), it has the same definition as in our Terms and Conditions (<https://tinyurl.com/vzc4vty>).

#### 1.2 Data Controller

When this policy mentions “Tech4COVID19,” “GuestCentric”, “we,” “us,” or “our,” it refers to Tech4COVID19 and GuestCentric which are both responsible for your information under this Privacy Policy (“Data Controller”).

### 2. INFORMATION WE COLLECT

There are three general categories of information we collect.

## 2.1 Information You **Give to Us**.

### 2.1.1 Information that is necessary for the use of the Rooms Against Covid Platform.

We ask for and collect the following personal information about you when you use the Rooms Against Covid Platform. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested services.

**Account Information.** When you sign up for an Rooms Against Covid Account, we require certain information such as your first name, last name, email address, and date of birth.

**Profile and Listing Information.** To use certain features of the Rooms Against Covid Platform, we may ask you to provide additional information, which may include your address, phone number, and a profile picture of you.

**Identity Verification Information.** To help create and maintain a trusted environment, we may collect identity verification information (such as the number of your professional licence, as permitted by applicable laws) or other authentication information.

**Communications with Rooms Against Covid and other Partners.** When you use the Rooms Against Covid Platform to communicate with other Partners, we collect information about your communication and any information you choose to provide.

### 2.1.2 Information you **choose to give us**.

You may choose to provide us with additional personal information in order to obtain a better user experience when using Rooms Against Covid Platform. This additional information will be processed based on our legitimate interest or when applicable, your consent.

**Other Information.** You may otherwise choose to provide us information when you fill in a notes or special requests form form, update or add information to your Rooms Against Covid Account, communicate with our support team, or use other features of the Rooms Against Covid Platform.

### 2.1.3 Information We Automatically Collect from Your Use of the Rooms Against Covid Platform.

When you use the Rooms Against Covid Platform, we automatically collect personal information about the services you use and how you use them. This information is necessary for the adequate performance of the contract between you and us, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the functionalities of the Rooms Against Covid Platform.

**Geo-location Information.** When you use certain features of the Rooms Against Covid Platform, we may collect information about your precise or approximate location as determined through data such as your IP address or mobile device's GPS to offer you an improved user experience. Most mobile devices allow you to control or disable the use of location services for applications in the device's settings menu.

**Usage Information.** We collect information about your interactions with the Rooms Against Covid Platform such as the pages or content you view, your searches for Listings, bookings you have made, and other actions on the Rooms Against Covid Platform.

**Log Data and Device Information.** We automatically collect log data and device information when you access and use the Rooms Against Covid Platform. That information includes, among other things: details about how you've used the Rooms Against Covid Platform (including if you clicked on links to third party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data.

**Cookies and Similar Technologies.** We use cookies and other similar technologies when you use our platform, use our mobile app, or engage through email communications. We may collect certain information by automated means using technologies such as cookies, web beacons, pixels, browser analysis tools, server logs, and mobile identifiers. In many cases the information we collect using cookies and other tools is only used in a non-identifiable without reference to personal information.

### 2.1.4 Information We Collect from **Third Parties**.

Rooms Against Covid may collect information, including personal information, that others provide about you when they use the Rooms Against Covid Platform, or obtain information from other sources and combine that with information we collect through the Rooms Against Covid Platform. We do not control, supervise or respond for how the third parties providing your information process your Personal Information, and any information request regarding the disclosure of your personal information to us should be directed to such third parties.

## 2.2 Children's Data.

Our website and application are not directed to children under 16 and we do not knowingly collect any personal information directly from children under 16. If you believe that we are processing the personal information pertaining to a child inappropriately, we take this very seriously and urge you to contact us using the information provided under the "Contact Us" section below.

## 3. HOW WE USE INFORMATION WE COLLECT

We may use, store, and process personal information to (1) provide, understand, improve, and develop the Rooms Against Covid Platform, (2) create and maintain a trusted and safer environment (such as to comply with our legal obligations).

All the data collected previously to or through the Rooms Against Covid Platform, as well as all the personal data collected outside the Platform (that is, through other means), shall be subject to the data processing set out in this Policy, for the same purposes.

3.1 Provide, Improve, and Develop the Rooms Against Covid Platform. We may use the personal information to provide, improve, and develop the Rooms Against Covid Platform such as to:

- a. enable you to access and use the Rooms Against Covid Platform,
- b. enable you to communicate with other Partners,
- c. provide customer support,

- d. send you service or support messages, updates, security alerts, and account notifications,
- e. if you provide us with your contacts' information, we may process this information: (i) to facilitate your referral invitations, (ii) send your requests for references, (iii) for fraud detection and prevention, and (iv) for any purpose you authorize at the time of collection,
- f. to operate, protect, improve, and optimize the Rooms Against Covid Platform and experience, and personalize and customize your experience (such as making Listing suggestions, ranking search results), and facilitate claims with our Host Guarantee, Host Protection Insurance, Experience Protection Insurance or other similar host protection programs; and

We process this personal information for these purposes given our legitimate interest in improving the Rooms Against Covid Platform and our Partners experience with it, and where it is necessary for the adequate performance of the contract with you.

### 3.2 Create and Maintain a Trusted and Safer Environment.

We may use the personal information to create and maintain a trusted and safer environment such as to:

- a. detect and prevent fraud, spam, abuse, security incidents, and other harmful activity,
- b. conduct security investigations and risk assessments,
- c. verify or authenticate information or identifications provided by you (such as to verify your Accommodation address or compare your identification photo to another photo you provide),
- d. conduct checks against databases and other information sources, including background or police checks, to the extent permitted by applicable laws and with your consent where required,
- e. comply with our legal obligations,
- f. Resolve any disputes with any of our Partners and enforce our agreements with third parties,

- g. enforce our Terms and other policies, and

We process this personal information for these purposes given our legitimate interest in protecting the Rooms Against Covid Platform, to measure the adequate performance of our contract with you, and to comply with applicable laws.

3.3 How the Payments Data Controller uses the Personal Information Collected. We may use the personal information as a part of Payment services such as to:

- a. Cross data to provide the requested results.
- b. Detect and prevent fraud, abuse, security incidents, and other harmful activity.
- c. Conduct security investigations and risk assessments.
- d. Conduct checks against databases and other information sources.
- e. Comply with legal obligations (such as anti-money laundering regulations).

The Payments Data Controller processes this personal information given its legitimate interest in improving the Payment Services and its users' experience with it, and where it is necessary for the adequate performance of the contract with you and to comply with applicable laws.

## 4. SHARING & DISCLOSURE

### 4.1 Sharing between Partners.

To help facilitate and provide for the necessary bookings or other interactions between Partners, we may need to share certain information, including personal information, with other Partners, as it is necessary for the adequate performance of the contract between you and us, as follows:

- a. When you as a User submit a booking request, certain information about you is shared with the Host (and Co-Host, if applicable), including, merely as an example, your profile, first and last name, professional license, and other information you agree to share. When your booking is confirmed, we will disclose additional information to assist with coordinating the booking, like, merely as an example, your contacts.
- b. When you as a Host (or Co-Host, if applicable) have a confirmed booking, certain information is shared with the Guest (and the additional Guests they may

invite, if applicable) to coordinate the booking, such as your profile, full name, phone number, and Accommodation address or informations.

- c. When you as a Host invite another Partner to become a Co-Host, you authorize the Co-Host to access and update your information and Partner Content, including but not limited to certain information like your full name, phone number, Accommodation address, calendar, Listing information, Listing photos, email address or othe relevant information and data.
- d. When you as a Guest invite additional Guests to a booking, your full name, travel dates, Host name, Listing details, the Accommodation address, and other related information may be shared with each additional Guest.
- e. When you as a Guest initiate a Group Booking Request certain information about each participant such as first name, last initial, profile picture as well as the booking details or any of the aforementioned data is shared among all participants of the Group Booking Request.

#### 4.2 Profiles, Listings, and other Public Information.

The Rooms Against Covid Platform lets you publish information, including personal information, that is visible to the general public. For example:

- (i) Parts of your public profile page, such as your first name, are publicly visible to others.
- (ii) Listing pages are publicly visible and include information such as the Accommodation's approximate location (neighborhood and city) or precise location (where you have provided your consent), Listing description, calendar availability, your public profile photo, aggregated demand information and any additional information you choose to share.
- (iii) After completing a booking, Guests and Hosts may write Reviews and rate each other. Reviews and Ratings are a part of your public profile page and may also be surfaced elsewhere on the Rooms Against Covid Platform (such as the Listing page).

- (iv) If you submit content in a community or discussion forum, blog or social media post, or use a similar feature on the Rooms Against Covid Platform, that content might be publicly visible.

Information you share publicly on the Rooms Against Covid Platform may be indexed through third party search engines. You may opt-out of this feature in your Account settings or, if these are not available at the moment, through and email to alojamentos@tech4covid19.org. If you change your settings or your public-facing content, these search engines may not update their databases. We do not control the practices of third party search engines, and they may use caches containing your outdated information.

#### 4.4 Additional Services by Hosts.

Hosts may need to use third party services available through the Rooms Against Covid Platform to assist with managing their Accommodation or providing additional services requested by you, such as cleaning services or lock providers. Hosts may use features on the Rooms Against Covid Platform to share information about the Guest (like check-in and check-out dates, Guest name, Guest phone number) with such third party service providers for the purposes of coordinating the stay, managing the Accommodation, or providing other services. The referred third party service providers must ensure that they process Guest information securely and in compliance with applicable law including data privacy and data protection laws.

#### 4.5 Compliance with Law, Responding to Legal Requests, Preventing Harm and Protection of our Rights.

The Data Controller may disclose your information, including personal information, to courts, law enforcement, governmental authorities, tax authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or if such disclosure is reasonably necessary: (i) to comply with our legal obligations, (ii) to comply with a valid legal request or to respond to claims asserted against it, (iii) to respond to a valid legal request relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability, (iv) to enforce and administer our

Terms or other agreements with Partners, or (v) to protect the rights, property or personal safety of the Data Controller, its employees, its Partners, or members of the public.

These disclosures may be necessary to comply with our legal obligations, for the protection of your or another person's vital interests or for the purposes of our or a third party's legitimate interest in keeping the Rooms Against Covid Platform secure, preventing harm or crime, enforcing or defending legal rights, facilitating the collection of taxes and prevention of tax fraud or preventing damage.

Where appropriate, we may notify Partners about legal requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon the Partners and the Rooms Against Covid Platform. In instances where we comply with legal requests without notice for these reasons, we may attempt to notify that Member about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

#### 4.6 Service Providers.

We use a variety of third-party service providers to help us provide services related to the Rooms Against Covid Platform. Service providers may be located inside or outside of the European Economic Area ("EEA").

For example, service providers may help us: (i) check information against public databases, (ii) conduct fraud prevention, and risk assessment, (iii) perform product development, maintenance and debugging, (iv) allow the provision of the services through third party platforms and software tools, or (vi) provide customer service or support, or (vii) process, handle or assess insurance claims or other similar claims. These providers have limited access to your personal information to perform these tasks on our behalf, and are contractually bound to protect the personal information and only use the personal information in accordance with our instructions.

For these purposes, we might need to share your information, including personal information, in order to ensure the adequate performance of our contract with you.

#### 4.7 Programs with Managers and Owners.

We may share personal information and booking information with landlords, management companies, and/or property owners in order to facilitate programs with these partners. For example, guest booking and personal information may be shared with owners and property managers of the building, complex, or planned community where a host lives and/or the listing is to facilitate hosting services, security, billing, and other services that may be provided.

### 5. OTHER IMPORTANT INFORMATION

#### 5.1 Analyzing your Communications.

We may review, scan, or analyze your communications on the Rooms Against Covid Platform for fraud prevention, risk assessment, regulatory compliance, investigation, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyze messages to mask contact information and references to other websites. We use automated methods where reasonably possible. However, occasionally we may need to manually review some communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyze your messaging communications to send third party marketing messages to you, and we will not sell reviews or analyses of these communications.

These activities are carried out based on our legitimate interest in ensuring compliance with applicable laws and our Terms, preventing fraud, promoting safety, and improving and ensuring the adequate performance of our services.

#### 5.2 Third Party Partners & Integrations

The Rooms Against Covid Platform may contain links to third party websites or services, such as third party integrations, co-branded services, or third party-branded services (“Third Party Partners”). We don’t own or control these Third Party Partners and when you interact with them, you may be providing information directly to the Third Party Partner, us, or both. These

Third Party Partners will have their own rules about the collection, use, and disclosure of information. We encourage you to review the privacy policies of the other websites you visit.

Parts of the Rooms Against Covid Platform may use third party services such as Google Maps/Earth services, including the Google Maps API(s). Use of these respective services is subject to their privacy policies.

## 6. YOUR RIGHTS

Consistent with applicable law, you may exercise any of the rights described in this section. See [here](#) for information on data subject rights requests and how to submit a request. Please note that we may ask you to verify your identity and request before taking further action on your request.

### 6.1 Managing Your Information.

You may access and update some of your information through your Account settings. If you have chosen to connect your Rooms Against Covid Account to a third-party application, like Facebook or Google, you can change your settings and remove permission for the app by changing your Account settings. You are responsible for keeping your personal information up to date.

### 6.2 Rectification of Inaccurate or Incomplete Information.

You have the right to ask us to correct inaccurate or incomplete personal information about you that you cannot update yourself within your Rooms Against Covid Account.

### 6.3 Data Access and Portability.

You have the right to request copies of your personal information held by us. However, a proportional fee may be charged for recurrent requests. You may also be entitled to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

#### 6.4 Data Retention and Erasure.

We retain your personal information only for as long as it is necessary for the performance of the contract between you and us and to comply with our legal obligations. You can request to have all your personal information deleted entirely. Please note that if you request the erasure of your personal information:

- (i) We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety.
- (ii) We may retain and use your personal information to the extent necessary to comply with our legal obligations.
- (iii) Information you have shared with others (e.g., Reviews, forum postings) may continue to be publicly visible on the [\*] Platform, even after your [\*] Account is cancelled. However, attribution of such information to you will be removed. Additionally, some copies of your information (e.g., log records) may remain in our database, but are disassociated from personal identifiers.

Because we maintain the Rooms Against Covid Platform to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

#### 6.5 Withdrawing Consent and Restriction of Processing.

If we are processing your personal information based on your consent you may withdraw your consent at any time by changing your Account settings or by sending a communication to [alojamentos@tech4covid19.org](mailto:alojamentos@tech4covid19.org) specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. Additionally, you have the right to limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal

claims; or (iv) you have objected to the processing pursuant to Section 6.6 and pending the verification whether the legitimate grounds of Rooms Against Covid override your own.

#### 6.6 Objection to Processing.

You have the right to require Rooms Against Covid not to process your personal information for certain specific purposes where such processing is based on legitimate interest. If you object to such processing Rooms Against Covid and/or its Partners will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing, or such processing is required for the establishment, exercise or defence of legal claims.

#### 6.7 Lodging Complaints.

You have the right to lodge complaints about our data processing activities by filing a complaint with our Data Protection Officer who can be reached by the “Contact Us” section below or with a supervisory authority.

### 7. INTERNATIONAL TRANSFERS

Rooms Against Covid may transfer, store, and process your information using resources and service providers based in Europe or outside the EEA. Laws in third countries may differ from the laws applicable to your country of residence. Where we transfer, store, and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

This may be an adequacy decision of the European Commission confirming an adequate level of data protection in the respective non-EEA country or an agreement on the basis of the EU Model Clauses (a set of clauses issued by the European Commission). We will provide further information on the means to ensure an adequate level of data protection on request.

We do not sell personal information to third parties. We do allow third parties to collect personal information through our services and share personal information with third parties for the business purposes described in this Privacy Policy.

## 8. SECURITY

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, and information access controls.

If you know or have reason to believe that your Rooms Against Covid Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Account, please contact us following the instructions in the Contact Us section below.

## 9. CHANGES TO THIS PRIVACY POLICY

Rooms Against Covid reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the Rooms Against Covid Platform and update the “Last Updated” date at the top of this Privacy Policy. If you disagree with the revised Privacy Policy, you may cancel your Account. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of the Rooms Against Covid Platform will be subject to the revised Privacy Policy.

## 10. CONTACT US

If you have any questions or complaints about this Privacy Policy or Rooms Against Covid information handling practices, you may contact us via mail at: [alojamentos@tech4covid19.org](mailto:alojamentos@tech4covid19.org).