

Student Sublease's Privacy Policy

Effective: January 1, 2021

Introduction

This is STUDENT SUBLEASE's policy regarding the collection, use, and disclosure of personally-identifiable information that we may obtain from you. It explains what kinds of information we collect, how we collect this information, how we use this information, whether we share this information, and what kind of control you have over our use, sharing, and retention of this information. If you use the Services, or otherwise provide personally identifiable information ("PII") to us, you agree to be bound by the terms of this policy.

WHAT KIND OF INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

We typically collect information that you provide through our website or application, which uses cookies to automatically collect information about your computing device, your use of the website or the application, and about your use of our website and application. This information includes, but is not limited to, data about your operating system, IP address, geolocation data, language, the website pages or sections or the application you consulted, key words, date, time, the amount of time you spend using the Webpage and the application and parts of the webpage and the application you use. In addition to the website and the application, we may also collect and combine information from the following sources:

- Your feedback
- Business partners through which you create or access your Student Sublease account, e.g. social media services or applications or websites using our APIs or whose API we use
- Your college or university residence if you create, upload, or post a Residential Listing (as defined in the Terms of Use)
- Publicly-available sources
- Marketing organizations
- When you establish your account, STUDENT SUBLEASE will collect certain information about you in order to provide the Services (as defined in the Terms of Use) to you, including personally-identifiable information ("PII"). PII consists of information which enables you to be uniquely identified. STUDENT SUBLEASE collects the following personal data from you when you register for an account with us:
 - Your full name
 - Your email address
 - Your login password
 - Your telephone number
 - The college or university in which you attend
- When you contact Student Sublease for customer support
- When you contact other Student Sublease account holders and customers

We may also collect the following information when you use the Services:

- Location Information
 - When searching for a Residential Listing on our website, we may use your location or the location you search to find relevant listings around you or the location you search
- Device Information
 - Student Sublease may collect information about devices you use to access our services, including the hardware models, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, mobile network information, computer network information, and browser information.
- Conversation and Messaging Information
 - Student Sublease will collect information regarding conversations and messages you have through The Service with other Student Sublease account holders and customers including who the conversation is with, the messages exchanged, whether or not the messages have been read, and the date and time the messages were exchanged. Student Sublease may use this information to notify you of unread messages. Student Sublease may also use this information for customer support services (including to resolve disputes between Student Sublease account holders and customers), for safety and security purposes, and for analytics. Student Sublease employees, partners, and personnel will not view or share the messages between you and another Student Sublease account holder and customer.
- Log Information
 - When you interact with our services, we collect server logs, which may include information like device IP address, access dates and times, website features or pages viewed, website crashes and other system activity, and the third-party site or service you were using before interacting with our services.
- Search Information
 - Student Sublease may collect search queries made by you while using the Service to give you access to better and more targeted Residential Listing results.

HOW DO WE USE THE DATA WE COLLECT?

Any information collected by STUDENT SUBLEASE may be used for the following purposes:

- Providing the Services and associated features
- Safety and security
- Customer support
- Research and development
- Communications Among Users
- Communications from Us
- Application Analytics
- STUDENT SUBLEASE might combine your PII with non-identifying information obtained either from you directly, or from the website or application. If we combine PII with non-identifying information, we will protect the combined information using commercially-reasonable means as we would protect information consisting entirely of PII.
- If STUDENT SUBLEASE plans to use your PII for a purpose other than those included in this section, it will give you notice of this beforehand, including what specific type of information will be used and how we will use it, and you will have the right to opt-out of having your data used for such purpose.

HOW DO WE PROTECT THE DATA THAT WE COLLECT?

STUDENT SUBLEASE strives to ensure the security and confidentiality of the data and information it holds, including PII. For this reason, we have taken technical and organizational security measures that are commercially reasonable in order to prevent loss, wrongful use, or unauthorized access to such data and information. For example, we may use firewalls and Secure Socket Layer (SSL) encryption to ensure security of information and data in transit and in storage. At STUDENT SUBLEASE we are committed to moving fast and responsibly if the security of your data is at risk and to inform you about this if this is important with the greatest diligence. Please note that we will never ask you for your password via email or over the phone. All of these functions are handled through the website and the Service. You should report to us immediately at www.studentsublease.com/contact/ if anyone attempts to have you disclose your password or credit card information over the phone or via email.

WITH WHOM DOES STUDENT SUBLEASE SHARE MY INFORMATION, AND HOW DOES THIS SHARING OCCUR?

We may disclose your information, including PII, to our affiliates and certain non-affiliated organizations, including:

- To government agencies, including law enforcement agencies, where disclosure is required by law, to protect our rights and well-being, and that of our Customers and the general public. We reserve the right to disclose your PII to law enforcement if we suspect you are involved in any illegal activity. We will typically disclose this information electronically via computer network, or via fax or phone, although we may also pass information physically (i.e. hardcopy).
- We may share certain information with other Student Sublease account holders and customers that includes, but is not limited to, your first and last name, the college or university that you attend, your profile picture, or the Residential Listings that you have created, posted, or uploaded.
- We may share your information if we believe it is required by applicable law, regulation, legal process, or lawful government request. This may include sharing your information with law enforcement officials, government authorities, or other third parties as necessary to enforce our Terms of Service or other policies, or to protect the rights and property of our self or others, or in the event of a claim or dispute arising from the Services.
- We may share your information with others in connection with, or during negotiations for a merger, asset purchase, or restructuring, financing, or acquisition of all or a portion of our business with or into another company

WHAT CONTROL DO YOU HAVE OVER OUR COLLECTION OF DATA?

You can disable cookies at any time, although this could limit access to some sections of the browser and your browsing could be blocked at any time. You can block or disable cookies using your browser, which allows you to refuse the installation of all or some of the cookies, and to delete cookies that have already been installed. Most browsers are able to warn of the presence of cookies or reject them automatically. If you reject them, you may continue to use our website (and application), although the

use of some of its services may be limited, meaning that your experience on our website (and application) may be less satisfactory.

In addition, our application allows you to adjust your privacy settings, and mobile operating systems give users the ability to also adjust what types of information is collected, including information gathered using onboard devices such as GPS, WiFi, and cellular transceivers.

You may opt-out of any marketing and promotional messages you receive by contacting us at www.studentsublease.com/contact/ or by opting out via your Student Sublease account page. Please allow ten (10) days for this opt-out to take effect.

STUDENT SUBLEASE retains your information while your account remains active, unless you ask us to delete your information or your account. You may request to have your information deleted or anonymized, except as provided below. STUDENT SUBLEASE will retain your information after your account is deleted in the following cases:

- If there is an unresolved issue relating to your account, such as an unresolved claim or dispute;
- If we are required to by applicable law, whether in aggregated and/or anonymized form
- We may also retain certain information if necessary for our legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if we shut down a user's account because of unsafe behavior or security incidents, we may retain certain information about that account to prevent that user from opening a new account in the future.

WHO OWNS THE DATA COLLECTED?

By using Student Sublease and accompanying services as outlined in the Terms of Service, you grant Student Sublease a limited license to store and share the content you provide, including but not limited to Residential Listing pictures and related information, Residential Listing location, and your account information specified in our Terms of Service and Privacy Policy. You consent to the sharing of such content outlined here to other Student Sublease account holders and customers and partners of Student Sublease.

By opening an account and posting, uploading, or creating content onto this platform, you acknowledge that you own and are responsible for all the content you provide. This data and content must be in accordance with the rest of this Privacy Policy and our Terms of Service. You have full ownership over your data, and you may delete this information at any time by contacting us at www.studentsublease.com/contact/, managing your account from your Student Sublease account page, or managing your listings from the My Listings page.

OTHER IMPORTANT INFORMATION

You guarantee the quality of the information provided to us. That is, you guarantee that the data and information you provide is real, truthful, up-to-date and also belongs to you and not to third parties. Therefore, you may not supply data that is false or out-of-date. You must always identify yourself with your personal electronic mail address and with truthful and current data. This Privacy Policy, only refers to our website and application, and does not apply to links or websites of third parties which can be accessed from the website or the application. We have no control over the destination of these links and are in no way responsible for the contents of any of the website destinations from a link, nor for any link included in a website which is reached from the website or from the application, nor for any change or

update made to these sites. These links are only provided to inform you about other sources of information, and the inclusion of a link does not mean that STUDENT SUBLEASE approves of the website linked to.

This Privacy Policy shall be governed by the laws of the State of Georgia, notwithstanding its conflicts of laws provisions. Any disputes arising under this Privacy Policy shall be adjudicated in the state and federal courts located in Fulton County Georgia, and the Northern District of Georgia, respectively, and you hereby agree to submit to the personal jurisdiction of these courts by using our website and application.

By clicking "I agree to the privacy policy", you expressly acknowledge that you have read, understood, and taken steps to thoughtfully consider the consequences of this Agreement, that you agree to be bound by the privacy policy of the Agreement, and that you are legally competent to enter into this Agreement with the Company.