

Privacy Policy

Last Updated: 28th of May, 2020

1. INTRODUCTION

Your trust is important to us and we're committed to protecting the privacy and security of your personal information. The information that's shared with us helps us to provide a great experience with Scraye.

This Privacy Policy describes how we collect, use, process, and disclose your personal information, in conjunction with your access to and use of the Scraye Platform. This privacy policy describes our privacy practices for all websites, platforms and services that link to it. Please read the privacy policy on the applicable site.

1.1 Definitions

If you see an undefined term in this Privacy Policy (such as "Listing" or "Scraye Platform"), it has the same definition as in our Terms of Service ("Terms").

1.2 Data Controller

When this policy mentions "Scraye," "we," "us," or "our," it refers to the Scraye company that is responsible for your information under this Privacy Policy (the "Data Controller"). The Data Controller is Scraye Technologies Ltd.

1.3 Applicability to Payments

This Privacy Policy also applies to the Payment Services provided to you by Scraye. When using the Payment Services, you will be also providing your information, including personal information, to one or more Scraye entities, which will also be the Data Controller (the "Payments Data Controller") of your information related to the Payment Services, generally depending on your country of residence. The Payments Data Controller is Scraye Technologies Ltd.

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 Scraye Platform.

We ask for and collect the following personal information about you when you use the Scraye 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 a Scraye 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 Scraye Platform (such as renting a Listing), we may ask you to provide additional information, which may include your address, phone number, and a profile picture.
- **Identity Verification Information.** To help create and maintain a trusted environment, we may collect identity verification information (such as images of your government issued ID, passport, national ID card, or driving license, as permitted by applicable laws) or other authentication information.

- **Payment Information.** To use certain features of the Scraye Platform (such as renting a Listing), we may require you to provide certain financial information (like your bank account or credit card information) in order to facilitate the processing of payments.
- **Communications with Scraye.** When you communicate with Scraye, 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 Scraye Platform. This additional information will be processed based on our legitimate interest or when applicable, your consent.

- **Additional Profile Information.** You may choose to provide additional information as part of your Scraye profile (such as gender, preferred language(s), city, and a personal description).
- **Address Book Contact Information.** You may choose to import your address book contacts or enter your contacts' information manually to access certain features of the Scraye Platform, like inviting them to use Scraye.
- **Other Information.** You may otherwise choose to provide us information when you fill in a form, update or add information to your Scraye Account, respond to surveys, post to community forums, participate in promotions, communicate with our customer care team, share your experience with us, or use other features of the Scraye Platform.

2.1.3 Information that is necessary for the use of the Payment Services.

The Payments Data Controller needs to collect the following information necessary for the adequate performance of the contract with you and to comply with applicable law (such as anti-money laundering regulations). Without it, you will not be able to use Payment Services:

- **Payment Information.** When you use the Payment Services, the Payments Data Controller requires certain financial information (like your bank account or credit card information) in order to process payments and comply with applicable law.
- **Identity Verification and Other Information.** If you are a Tenant, the Payments Data Controller may require identity verification information (such as images of your government issued ID, passport, national ID card, or driving license) or other authentication information, your date of birth, your address, email address, phone number and other information in order to verify your identity, provide the Payment Services to you, and to comply with applicable law.

2.1.4 Information We Automatically Collect from Your Use of the Scraye Platform and Payment Services.

When you use the Scraye Platform and the Payment Services, 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 Scraye Platform and Payment Services.

- **Geo-location Information.** When you use certain features of the Scraye 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. Scraye may also collect this information even when you are not using the app if this connection is enabled through your settings or device permissions.
- **Usage Information.** We collect information about your interactions with the Scraye Platform such as the pages or content you view, your searches for Listings, bookings you have made, and other actions on the Scraye Platform.

- **Log Data and Device Information.** We automatically collect log data and device information when you access and use the Scraye Platform, even if you have not created an Scraye Account or logged in. That information includes, among other things: details about how you've used the Scraye 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, and the pages you've viewed or engaged with before or after using the Scraye Platform.
- **Cookies and Similar Technologies.** We use cookies and other similar technologies when you use our platform, use our mobile app, or engage with our online ads or 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. For example, we may use information we collect to better understand website traffic patterns and to optimize our website experience. In some cases we associate the information we collect using cookies and other technology with your personal information. Our business partners may also use these tracking technologies on the Scraye Platform or engage others to track your behavior on our behalf.
- **Do Not Track Signals.** While you may disable the usage of cookies through your browser settings, the Scraye Platform currently does not respond to a "Do Not Track" signal in the HTTP header from your browser or mobile application due to lack of standardisation regarding how that signal should be interpreted.
- **Payment Transaction Information.** Scraye Payments collects information related to your payment transactions through the Scraye Platform, including the payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, your address and other related transaction details. This information is necessary for the adequate performance of the contract between you and Scraye Payments and to allow the provision of the Payment Services.

2.1.5 Information We Collect from Third Parties.

Scraye and Scraye Payments may collect information, including personal information, that others provide about you when they use the Scraye Platform and the Payment Services, or obtain information from other sources and combine that with information we collect through the Scraye Platform and the Payment Services. 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.

- **Reference Checks.** For Tenants seeking to rent a Listing, to the extent permitted by applicable laws, Scraye and Scraye Payments may obtain reports from third party databases regarding among others your address history, credit score, any bankruptcies and other referencing-related matters. We may use your information, including your full name and date of birth, to obtain such reports.
- **Referrals.** If you are invited to Scraye, the person who invited you may submit personal information about you such as your email address or other contact information.
- **Other Sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or information to help detect fraud and safety issues, from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results (with your consent where required) or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the Scraye Platform through partnerships, or about your experiences and interactions from our partner ad networks.

2.2 Children's Data.

Our websites and applications 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 Scraye Platform, (2) create and maintain a trusted and safer environment (such as to comply with our legal obligations and ensure compliance with Scraye Policies) and (3) provide, personalize, measure, and improve our advertising and marketing.

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

- enable you to access and use the Scraye Platform,
- operate, protect, improve, and optimize the Scraye Platform and experience, such as by performing analytics and conducting research,
- provide customer service,
- send you service or support messages, updates, security alerts, and account notifications,
- 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, and
- to operate, protect, improve, and optimize the Scraye Platform and experience, and personalize and customize your experience (such as making Listing suggestions, ranking search results), and facilitate claims with our Damage Protection, Rent Protection or other similar landlord protection programs, we conduct profiling based on your interactions with the Scraye Platform, your search and rental history, your profile information and preferences, and other content you submit to the Scraye Platform.

We process this personal information for these purposes given our legitimate interest in improving the Scraye Platform and our Users’ 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:

- detect and prevent fraud, spam, abuse, security incidents, and other harmful activity,
- conduct security investigations and risk assessments,
- verify or authenticate information or identifications provided by you,
- 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,
- comply with our legal obligations,
- Resolve any disputes with any of our Members and enforce our agreements with third parties,
- enforce our Terms of Service and other policies, and
- in connection with the activities above, we may conduct profiling based on your interactions with the Scraye Platform, your profile information and other content you submit to the Scraye Platform, and information obtained from third parties. In limited cases, automated processes may restrict or suspend access to the Scraye Platform if such processes detect activity that we think poses a safety or other risk to the Scraye Platform, our community, or third parties. If you challenge the decisioning based on the automated process, please contact us as provided in the Contact Us section below.

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

3.3 Provide, Personalise, Measure, and Improve our Advertising and Marketing. We may use the personal information to provide, personalise, measure, and improve our advertising and marketing such as to:

- send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences (including information about Scraye or partner campaigns and services) and social media advertising through social media platforms such as Facebook or Google),
- personalise, measure, and improve our advertising,
- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Scraye or its third party partners,
- conduct profiling on your characteristics and preferences (based on the information you provide to us, your interactions with the Scraye Platform, information obtained from third parties, and your search and booking history) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you,
- enrolling in an email subscription will not affect the frequency of administrative emails that we may send in connection with any Scraye Account. No fee is charged for sending promotional emails to you, but third-party data rates may apply. Note that you may not be able to take advantage of certain promotions if you do not have an Scraye Account, and
- invite you to events and relevant opportunities.

We will process your personal information for the purposes listed in this section given our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest.

3.4 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:

- Enable you to access and use the Payment Services.
- Detect and prevent fraud, abuse, security incidents, and other harmful activity.
- Conduct security investigations and risk assessments.
- Conduct checks against databases and other information sources.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce the Payment Terms and other payment policies.
- With your consent, send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences.

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 Advertising and Social Media; Sharing With Your Consent.

Where you have provided consent, we share your information, including personal information, as described at the time of consent, such as when you authorise a third party application or website to access your Scraye Account or when you participate in promotional activities conducted by Scraye partners or third parties.

Where permissible according to applicable law we may use certain limited personal information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, to generate leads, drive traffic to our websites or otherwise promote our products and services or the Scraye Platform. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest.

The social media platforms with which we may share your personal information are not controlled or supervised by Scraye. Therefore, any questions regarding how your social media platform service provider processes your personal information should be directed to such provider.

Please note that you may, at any time ask Scraye to cease processing your data for these direct marketing purposes by sending an e-mail to **hello@scraye.com**.

4.2 Sharing between Users.

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

- When you as a Tenant submit a tenancy request, certain information about you is shared with the Landlord, including your profile, full name, the full name of any additional Tenants, your reference check results, and other information you agree to share. When your tenancy is confirmed, we will disclose additional information to assist with coordinating the rental, like your phone number.

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

Scraye may disclose your information, including personal information, to courts, law enforcement, governmental authorities, tax authorities, or authorised 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 Scraye, (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 of Service, the Payment Terms or other agreements with Users, or (v) to protect the rights, property or personal safety of Scraye, its employees, its Users, or members of the public. For example, if permitted due to the forgoing circumstances, Host tax information may be shared with tax authorities or other governmental agencies.

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 Scraye 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 Users 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 Scraye's property, its Users and the Scraye Platform. In instances where we comply with legal requests without notice for these reasons, we may attempt to notify that User about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

4.4 Service Providers.

Scraye and Scraye Payments uses a variety of third-party service providers and credit reference agencies to help us provide services related to the Scraye Platform. Service providers may be located

inside or outside of the European Economic Area (“EEA”). In particular, our service providers are based in Europe, India, Asia Pacific and North and South America.

For example, service providers may help us: (i) verify your identity or authenticate your identification documents, (ii) check information against public databases, (iii) conduct background or police checks, fraud prevention, and risk assessment, (iv) perform product development, maintenance and debugging, (v) allow the provision of the Scraye Services through third party platforms and software tools (e.g. through the integration with our APIs), (vi) provide customer service, advertising, or payments services, or (vii) process, handle or assess insurance claims or other similar claims (such as claims under the Damage Protection or Rent Protection). 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 .

Scraye will need to share your information, including personal information, in order to ensure the adequate performance of our contract with you.

4.5 Corporate Affiliates.

To enable or support us in providing the Scraye Platform, we may share your information, including personal information, within our corporate family of companies (both financial and non-financial entities) that are related by common ownership or control.

Additionally, we share your information, including personal information, with our corporate affiliates in order to support and integrate, promote, and to improve the Scraye Platform and our affiliates’ services.

4.6 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, tenancy details and personal information may be shared with owners and property managers of the building, complex, or planned community where a Landlord lives and/or the listing is to facilitate hosting services, security, billing, and other services that may be provided.

4.7 Business Transfers.

If Scraye undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred and becomes subject to a different privacy policy.

4.8 Aggregated Data.

We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, research, demographic profiling, marketing and advertising, and other business purposes.

5. OTHER IMPORTANT INFORMATION

5.1 Analysing your Communications.

We may review, scan, or analyse your communications on the Scraye Platform for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, analytics, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyse messages to mask contact information and references to other websites. In some cases, we may also scan, review, or analyse messages to debug, improve, and expand product offerings. 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 analyse 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 Scraye's 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 Scraye 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"). Scraye doesn'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, Scraye, 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 Scraye Platform may use third party services such as Google Maps/Earth services, including the Google Maps API(s).

6. YOUR RIGHTS

Consistent with applicable law, you may exercise any of the rights described in this section before your applicable Scraye Data Controller and Payments Data Controller. 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. 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 (and which you cannot update yourself within your Scraye Account).

6.3 Data Access and Portability.

In some jurisdictions, applicable law may entitle you to request certain copies of your personal information held by us. 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 generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. In certain jurisdictions, you can request to have all your personal information deleted entirely." Please note that if you request the erasure of your personal information:

- We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if we suspend a Scraye Account for fraud or safety reasons, we may retain certain information from that Scraye Account to prevent that Member from opening a new Scraye Account in the future.

- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, Scraye may keep some of your information for tax, legal reporting and auditing obligations.
- Information you have shared with others may continue to be publicly visible on the Scraye Platform, even after your Scraye 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 Scraye 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 sending a communication to Scraye 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, in some jurisdictions, applicable law may give you 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 Scraye override your own.

6.6 Objection to Processing.

In some jurisdictions, applicable law may entitle you to require Scraye Payments not to process your personal information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing Scraye 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.

Where your personal information is processed for direct marketing purposes, you may, at any time ask Scraye to cease processing your data for these direct marketing purposes by sending an e-mail to hello@scraye.com.

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.

6.8 Third Parties.

We do not sell personal information to third parties. We do allow third parties to collect personal information through our Service and share personal information with third parties for the business purposes described in this Privacy Policy, including without limitation advertising and marketing on our Service and elsewhere based on users' online activities over time and across different sites, services, and devices.

7. 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 Scraye

Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Scraye Account, please contact us following the instructions in the Contact Us section below.

8. CHANGES TO THIS PRIVACY POLICY

Scraye 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 Scraye 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 Scraye Platform will be subject to the revised Privacy Policy.

9. CONTACT US

If you have any questions or complaints about this Privacy Policy or Scraye’s information handling practices, you may email us at the email addresses provided in the relevant sections above.