

# Privacy Policy

*\*The Spanish version of the Privacy Policy prevails over this document. This document is for information purposes only. If you have any questions, please write to [info@roomie-radar.com](mailto:info@roomie-radar.com)*

Update to our privacy policy:

As part of our ongoing efforts to improve transparency and to ensure that the personal data provided to us by our users is handled lawfully, we have updated our Privacy Policy.

## 1. Introduction

This Privacy Policy (the "**Policy**") describes how ROOMIE-RADAR, S.L. (Sociedad de Responsabilidad Limitada) ("**roomie-radar**" or "**we/us/our**") collects, uses, stores, shares and protects personal information derived from your (the "**User**") use of both the platform accessible through the domain <https://roomie-radar.com> (the "**Site**") and our Application (the "**App**"), as well as the services that we may offer from time to time through the Site or the App (referred to interchangeably as the "**Services**").

If you have any questions or requirements in relation to the Policy, you may send an enquiry to [info@roomie-radar.com](mailto:info@roomie-radar.com).

## 2. Who is responsible for the processing of your personal data?

The personal data that you provide during the registration process as a User, as well as all data that you provide during the provision of the services or that roomie-radar may obtain through the use of the Site and/or the App, will be processed by ROOMIE-RADAR, S.L., with registered office at 07100-Sóller (Islas Baleares), calle Camí de Son Sales, número 6, and whose contact email address is [info@roomie-radar.com](mailto:info@roomie-radar.com).

The processing of personal data is governed by this Policy. All terms written in the Policy shall have the meaning set out in the Terms and Conditions of Use.

## 3. For what purposes do we process your data?

Personal data will be collected and processed within the framework of the Service offered through the Site and/or the App for the following purposes:

(a) To manage the registration of Users and to be able to control the development and fulfilment of the contractual relationship that we maintain with you, in accordance with the Terms and Conditions of Use. In particular, roomie-radar will process the following categories of data and for the purposes specified below:

Categories of personal data	Purposes of processing
Basic information required for registration and provision of the Services (login data, registration information, name, title, address, date of birth, username and password).	Validation of the user, creation of an account in roomie-radar and provision of the Services by roomie-radar.
Basic contact information (telephone and email address).	Contacting the client for the execution of the contractual relationship; advertising (if applicable).
Additional contact information (profession/professional sector, additional identification data, e.g. ID card or passport and nationality).	Customer identity verification and fraud prevention.
Transaction information, as well as billing and delivery address information.	Processing of payment and fulfilment of the contractual relationship.
Payment information (partial credit card details).	User account registration, transaction processing and fraud prevention.
Information about communications with other users, as well as the use made of our Site and/or App, to the extent permitted by law and in accordance with applicable law.	To ensure a safe and secure environment, prevent fraud, abuse or other misuse of the Site, the App or the Services, resolve disputes with other users and comply with any applicable legal obligations.
Usage data, in particular technical and device-related information and data transmission (IP address, device fingerprint/ID, functional and web tracking data, login and web usage data).	Personalization of offers; error resolution, fraud prevention, service improvement, user interface improvement and, if applicable, for marketing.
Geolocation data (latitude, longitude).	In order to be able to show properties near you, recommend properties near you.
Additional voice and data provided in calls made to roomie-radar or made by roomie-radar to the user.	In order to improve the quality and compliance of call handlers with the protocols.
Voice and image provided during video calls made on the roomie-radar platform.	To enable users to be identifiable to other users, as well as to qualify for access to and use of the video call service.

(b) To respond to queries that may be submitted to it by Users in relation to the App and the Site or the Services.

(c) To comply with applicable law and as required by applicable law, court orders or existing governmental regulations.

(d) for any other purpose stated at the time of collection of the personal data or as provided for by applicable data privacy laws.

Furthermore, and only if the User consents in each case, we will process his or her data for the following additional purposes:

(a) To learn more about your preferences by assessing your profile, using such data to improve your experience of using the Site and/or the App, prevent fraud and improve the service.

(b) If so requested, to send you advertising or commercial information, including by electronic means, about roomie-radar products and services that may be of interest to the User.

(c) If you consent, to process the image and voice of the User for identification to other users.

(d) To manage your participation in competitions and promotions.

Your personal data will also be processed when roomie-radar has to comply with an applicable obligation, such as those arising from tax and anti-money laundering regulations.

Whenever you interact with our App and/or the Site or use our Service, we automatically collect information such as: log data (e.g., access times, hardware, software information), usage information, browsing history, browser information, screen recording of Service interaction and usage, location data (e.g., IP address, postcode), device identification, "Cookie" information, page view statistics, the type of browser and/or device being used to access our Services, and the page or feature that was requested.

"Cookies" are identifiers that we transfer to your browser or device, which allow us to recognise you and so tell us how, when and how many people visit our Site or use our Service. You may be able to change your browser or device preferences to prevent or limit the acceptance of cookies, but this may prevent some of our features from being used. For more information about our use of Cookies, please see our Cookie Policy.

Please note that our service providers may also occasionally transmit cookies to your browser or device, for example, when you click on a link to a third-party website or service. This policy does not cover the use of cookies by third parties and therefore we are not responsible for their privacy policies and practices. Please note that cookies placed by third parties may continue to track your online activities even after you have left our Services, and those third parties may not comply with "Do Not Track" requests that you have set on your browser or device.

For example, Google, Inc. ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and Google's Privacy Policy. You have the option to opt out of Google's use of cookies by visiting the Google advertising opt-out page at [www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html) or the Google Analytics opt-out browser add-on at <https://tools.google.com/dlpage/gaoptout/>.

## **4. What is the legitimacy of the data processing?**

The legal basis for the processing of data is the execution of the Terms and Conditions of Use and of the Service, the processing of personal data being strictly necessary in order to be able to use the Site and the App and, therefore, to benefit from the services made available to Users.

With respect to the additional purposes, the consent given by the User, which may be revoked at any time without affecting the provision of the Services. Specifically, the User may withdraw his/her consent at any time by contacting [info@roomie-radar.com](mailto:info@roomie-radar.com).

## **5. How long do we keep personal data?**

Roomie-radar retains the personal data of Users as long as they hold the status of client or registered user of the Site and/or the App, being the personal data retained after the termination of the contractual relationship, duly blocked, for the period necessary to meet the responsibilities that may arise from it. In some cases, we retain personal data for a longer period either to comply with our legal obligations, to resolve disputes or collect unpaid fees, or where required or permitted by law, statute or applicable regulation.

In particular, the Personal Data necessary to respond to the queries you make, as well as to send you electronic commercial communications, will be processed as long as the User does not revoke the consent he/she has given and, once this consent has been withdrawn, for the period necessary to respond to any liabilities that may have arisen. In any case, when the personal data are not necessary for the purpose for which they were collected and until such time as they are definitively cancelled, they will be kept in blocked form.

As stated in the Terms and Conditions of Use, we do not knowingly collect or solicit personal data from children under the age of 16; if you are a child under the age of 16, please do not attempt to register or use the Services, or transfer personal data to us. If we discover that we have unintentionally collected personal information belonging to a child under the age of 16, we will delete that information as quickly as possible. Please contact us at [info@roomie-radar.com](mailto:info@roomie-radar.com) if you know or believe that a child under the age of 16 has provided us with personal information.

## **6. To which recipients will the data be disclosed?**

Roomie-radar will be able to communicate the personal data of the Users when it is required by law, for the defence of its rights and legitimate interests, or when it is necessary in compliance with the services contracted by the Users. They may also be accessed by third party providers of technical and computer support services, some of which are reported below.

Certain systems, data and services are hosted by Amazon Web Services ("AWS"), whose servers are located in Frankfurt (Germany) and Google Cloud Platform. In this regard, your data may be transferred internationally to the servers of this company in the United States. Roomie-radar will adopt appropriate mechanisms to ensure that the transfer of personal data is carried out in a framework equivalent to that provided by European data protection regulations.

## 7. What are your rights as a data subject?

Law	Content
Access	You may obtain confirmation as to whether your personal data are processed, as well as view your specific personal data that are processed.
Correction	You will be able to modify your personal data when they are inaccurate, as well as to complete those that are incomplete.
Suppression	You may request the deletion of your personal data when, among other reasons, the data are no longer necessary for the purposes for which they were collected.
Opposition	You may request that your personal data not be processed. The data will no longer be processed, except for compelling legitimate reasons, or for the exercise or defence of possible claims.
Treatment limitation	You may request the restriction of the processing of your data in the following cases: As long as the contestation of the accuracy of your data is verified; When the processing is unlawful, the User opposes the deletion of your data, and requests the limitation of its use; When your data does not need to be processed but is necessary for the exercise or defence of claims; Where you have objected to the processing of your data for the performance of a task carried out in the public interest or for the fulfilment of a legitimate interest, while we verify whether the legitimate grounds for the processing outweigh yours.
Portability	You may receive, in electronic form, the personal data that you have provided to us and those that have been obtained from your contractual relationship with roomie-radar, as well as to transmit them to another entity.

If you believe that your personal data have not been processed in accordance with the applicable regulations, you may lodge a complaint with the competent supervisory authority, via the website [www.agpd.es](http://www.agpd.es).

The exercise of these rights is free of charge.

### Channels of Attention

To exercise your rights, please send an e-mail to [info@roomie-radar.com](mailto:info@roomie-radar.com) indicating the right you wish to exercise.

## 8. Updating of information

The User may update the information held by roomie-radar through the settings enabled for this purpose in your account, or by sending a written communication to [info@roomie-radar.com](mailto:info@roomie-radar.com). We remind you that for roomie-radar can properly provide the Services, the User must keep your information updated, so it undertakes to promptly verify the information you have submitted to ensure that it is accurate.

You may request at any time that we do not send you email or marketing communications. To do so, you can change your communication preferences in the settings section of your account, or contact us at [info@roomie-radar.com](mailto:info@roomie-radar.com). This will not, however, prevent us from sending you emails or other communications in connection with the Services, as these are necessary to fulfil our contractual relationship with you.