

This Privacy Policy describes how VERO Technologies, Inc. and its affiliates ("we," "us," or "VERO"), process personal information that we collect through the VERO Platform. Depending on where you live and what you are doing on the VERO Platform, the supplemental privacy pages listed below may apply to you. Please follow the links and review the supplemental information provided there with information about how we process personal information for those regions and services.

IMPORTANT SUPPLEMENTAL INFORMATION

California and Vermont. If you reside in California or Vermont, visit our "California and Vermont" page to learn about specific privacy information that applies to you.

1. Definitions.

Undefined terms in this Privacy Policy have the same definition as in our Terms of Service ("Terms").

2. Personal Information We Collect.

2.1 Information needed to use the VERO Platform. We collect personal information about you when you use the VERO Platform. Without it, we may not be able to provide you with all services requested. This information includes:

- Contact Information, Account, Profile Information. Such as your first name, last name, phone number, postal address, email address, date of birth, and profile photo, some of which will depend on the features you use.
- Identity Authentication and Payment Information. Such as images of your government issued ID (as permitted by applicable laws), your ID number or other personal information, bank account or payment account information.

Other information you choose to give us. You can choose to provide us with additional personal information. This information may include:

- Additional Profile Information. Such as preferred gender identity, preferred languages, and personal preferences.
- Address Book Contact Information. Address book contacts you import or enter manually.
- Other Information. Such as when you fill in a form, add information to your account, respond to surveys, participate in promotions, communicate with our customer success team and other Members, or share your experience with us.

2.2 Information Automatically Collected by Using the VERO Platform and our Payment Services. When you use the VERO Platform and Payment Services, we automatically collect personal information. This information may include:

- Geo-location Information. Such as approximate location determined from your IP address or mobile device's GPS depending on your device settings. We may also collect this information when you're not using the app if you enable this through your settings or device permissions.
- Usage Information. Such as the pages or content you view, searches for Listings, applications you have made, and other actions on the VERO Platform.
- Log Data and Device Information. Such as details about how you've used the VERO Platform (including if you clicked on links to third party suppliers), 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 VERO Platform. We may collect this information even if you haven't created a VERO account or logged in.
- Cookies and similar technologies. These cookies and other trackers may permit third parties to directly collect your personal

information about your activities on the Vero Platform and other sites and services over time.

- Payment Transaction information. Such as payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, email address, IBAN information, your address and other related transaction details.

2.3 Information you choose to give us. You can choose to provide us with additional personal information. This information may include:

- Third-Party Suppliers. If you link, connect, or login to the VERO Platform with a third-party service, you direct the service to send us information such as your registration and profile information as controlled by that service or as authorized by you via your privacy settings at that service.
- Other Sources. To the extent permitted by applicable law, we may receive additional information about you, such as references, 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 fraud warnings from identity verification service providers for use in our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the VERO Platform, or about your experiences and interactions from our partners.

2.4 Children. Our products are intended for use by individuals who are at least 18 years old. If you are under the age of 18, you should not be using our products. We do not knowingly collect or retain personal information from children under the age of 18. If you are under the age of 18 and are visiting our website, you are expressly prohibited from using our services and are advised not to disclose or provide any personally identifiable information. If you have concerns that we are improperly in receipt of personal information on individuals under 18 other than that disclosed expressly by guardians, parents, or similar for the purpose of legally identifying minors in residence during a housing application, please contact us as we describe below.

3. How We Use Information We Collect.

3.1 Provide, Improve, and Develop the VERO Platform. We use personal information to:

- Enable you to access the VERO Platform and make and receive payments.
- Enable you to communicate with other Members.
- Perform analytics, debug and conduct research.
- Provide customer service.
 - **Purpose of SMS / Text Communications**
VERO uses SMS / text messages solely for operational purposes, including but not limited to:
 - Providing support for your account and any issues you may encounter.
 - Ensuring that your application process is completed efficiently and effectively.
 - By providing your cell phone number to VERO, you consent to receive SMS / text messages strictly for the operational reasons stated. If you have any questions or concerns about our SMS / text communications policy, please contact our support team for further assistance.
- Send you messages, updates, security alerts, and account notifications. If you provide us with your contacts' information such as your friends or co-applicants, we may process this information to facilitate your referral invitations, for fraud detection and prevention, and to facilitate your requests or for any other purpose you authorize.
- Personalize and customize your experience based on your interactions with the VERO Platform, your search and booking history, your profile information and preferences, and other content you submit.

For more information about how the VERO Platform may leverage subprocessors, see our [Subprocessor Disclosure](#).

3.2 Create and Maintain a Trusted and Safer Environment. We use personal information to:

- Detect and prevent fraud, spam, abuse, security and safety incidents, and other harmful activity.
- Combat discrimination.
- Conduct security investigations and risk assessments.
- Comply with our legal obligations, protect the health and well-being of our Renters, Leasing Providers, Leasing Providers' employees and members of the public.
- Resolve disputes with our Members.
- Enforce our agreements with third parties.
- Comply with law, respond to legal requests, prevent harm and protect our rights (see section 4.5).
- Enforce our [Terms](#) and other policies.

In limited cases, automated processes could restrict or suspend access to the VERO Platform based on your interactions with the VERO Platform, your profile information and other content you submit to VERO, and information obtained from third parties, if such processes detect activity that we think poses a safety or other risk to VERO, our Members, or third parties. If you would like to challenge the decisioning based on the automated process, please contact us via the Contact Information section below.

3.3 Provide, Personalize, Measure, and Improve our Advertising and Marketing. We may use personal information to:

- Send you promotional messages, marketing, advertising, and other information based on your preferences and social media advertising through social media platforms.
- Personalize, measure, and improve our advertising.
- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by VERO or its third-party partners.
- Analyze characteristics and preferences to send you promotional messages, marketing, advertising, and other information that we think might be of interest to you.
- Invite you to events and relevant opportunities.

3.4 Provide Payment Processing Services. Personal information is used to enable or authorize third parties to use Payment Processing Services:

- Detect and prevent money laundering, fraud, abuse, security incidents. Conduct security investigations and risk assessments.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce payment 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.
- Provide and improve the Payment Processing Services.

4. Sharing & Disclosure.

4.1 Sharing With Your Consent or at Your Direction. Where you provide consent, we share your information as described at the time of consent, such as when authorizing a third-party application or website to access your VERO account or participating in promotional activities by VERO partners or third parties.

Where permissible with applicable law, we may use certain information about you, such as your email address, de-identify it, and share it with social media platforms, to generate leads, drive traffic to VERO or otherwise promote our products and services.

4.2 Leasing Provider Service Providers. Leasing Providers may use third-party services to help manage or deliver their services, such as cleaning services or utility providers. Leasing Providers may use features on the VERO Platform to share information about the Renter (like move-in and move-out dates, Renter name, Renter phone number) with such third-party service providers. –

When an application is made or dispute is submitted, certain information may be shared between Renters and Leasing Providers, including profile, name, names of any additional Renters, cancellation history, review information, age of occupant (unless prohibited by applicable law), dispute outcome (when applicable) and other information you choose to share and submit. When an application is accepted, additional information is shared to assist with coordinating the transaction, like phone number.

When a Leasing Provider has accepted an application, certain information is shared with the Renter (and the additional Renters they invite, if applicable) to coordinate the transaction, such as your profile, full name, phone number, and Listing address.

4.3 Complying with Law, Responding to Legal Requests, Preventing Harm and Protecting our Rights. We may disclose your information to courts, law enforcement, governmental or public authorities, tax authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or where 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 VERO; (iii) to respond to a valid legal request relating to a criminal investigation to address alleged or suspected illegal activity, or to respond to or address any other activity that may expose us, you, or any other of our users to legal or regulatory liability; (iv) to enforce and administer agreements with Members; or (v) to protect the rights, property or personal safety of VERO, its employees, its Members, or members of the public.

Where appropriate, we may notify Members 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 or harm to VERO, our Members, or expose VERO to a claim of obstruction of justice.

4.4 Service Providers. We share personal information with affiliated and unaffiliated service providers to help us run our business, including service providers that 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 VERO Services through third-party platforms and software tools (e.g. through the integration with our APIs), (vi) provide customer service, advertising, or payments services, (vii) process, handle or assess insurance claims or similar claims, or (viii) facilitate non-profit and charitable activities consistent with VERO's mission. These providers are contractually bound to protect your personal information and have access to your personal information to perform these tasks.

4.4.1 Financial Institution Data. Vero uses Plaid Technologies, Inc. (“Plaid”) to gather Applicant’s data from financial institutions. By using our service, Applicant grants Vero and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. Applicant agrees to their personal and financial information being transferred, stored, and processed by Plaid in accordance with the [Plaid Privacy Policy](#).

4.4.2 Identity and Biometric Data. Vero uses Persona Identities, Inc. (“Persona”) to verify Applicant’s identity. By using our service, Applicant grants Vero and Persona the right, power, and authority to act on your behalf to access and transmit your personal and identity information. Applicant agrees to their personal and identity information being transferred, stored, and processed by Persona in accordance with the [Persona Privacy Policy](#).

4.5 Business Transfers. If VERO 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.

4.6 Corporate Affiliates. To support us in providing, integrating, promoting and improving the VERO Platform, Payment Services, and our affiliates' services, we may share personal information within our corporate family of companies that are related by common

ownership or control.

5. Other Important Information.

We may review, scan, or analyze your communications on the VERO Platform for reasons outlined in the "How We Use Information We Collect" section of this policy, including fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, analytics, enforcing our [Terms](#), 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 sites. In some cases, we may also scan, review, or analyze messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible. Occasionally we may need to manually review 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.

6. Your Rights.

You can exercise any of the rights described in this section consistent with applicable law via your VERO account or by emailing support@sayvero.com. 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 can access and update some of your personal information through your account settings. If you connected your VERO account to a third-party service, you can change your settings and unlink from that service. You are responsible for keeping your personal information up to date.

6.2 Data Access and Portability. In some jurisdictions, applicable law may entitle you to request certain copies of your personal information or information about how we handle your personal information, request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format, and/or request that we transmit this information to another service provider (where technically feasible).

6.3 Data Erasure. In certain jurisdictions, you can request that your personal information be deleted. Please note that if you request the erasure of your personal information:

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

We may retain and use your personal information to the extent necessary to comply with our legal obligations.

Because we take measures to protect data 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.

7. Security.

While no organization can guarantee perfect security, we are continuously implementing and updating administrative, technical, and physical security measures to help protect the confidentiality and security your confidential information against unauthorized access, loss, destruction, or alteration. Confidential information here includes social security numbers, access to which is limited. Unlawful disclosure of social security numbers is strictly prohibited. For detailed information on our data policies, encryption policies, and more, please visit <https://trust.sayvero.com>.

8. Changes To This Privacy Policy.

We reserve the right to modify this Privacy Policy at any time in accordance with applicable law. If we do so, we will post the revised Privacy Policy and update the "Last Updated" date at the top. In case of material changes, we will also provide you with notice of the modification by email at least thirty (30) days before the effective date. If you disagree with the revised Privacy Policy, you can 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 VERO Platform will be subject to the revised Privacy Policy.

9. Contact Information And Responsible VERO Entities.

For questions or complaints about this Privacy Policy or VERO's handling of personal information contact: VERO Technologies, Inc. 116 West Houston Street, 4th Floor, New York, NY 10012 or email support@sayvero.com.

Privacy Notice California and Vermont Residents

If you reside in California or Vermont this page applies to you and supplements the VERO [Privacy Policy](#).

1. California And Vermont Residents.

VERO will not share information we collect about you with our affiliates or third parties (both financial and non-financial), except as you specifically authorize or expressly permitted by your state's law.

2. California Privacy Rights.

Investigative Consumer Reporting Agencies Act (Calif. Civ. Code. 1786.10 et seq.) Personal Information Disclosure: United States or Overseas - Personal information may be transferred to third parties outside the United States or its territories.

A separate section that includes the name, mailing address, e-mail address, and telephone number of VERO representatives can assist a consumer with additional information regarding these privacy practices or policies in the event of a compromise of his or her information. To reach us, contact: Consumer Relations, VERO Technologies, Inc. 116 West Houston Street, 4th Floor, New York, NY 10012, email support@sayvero.com, or call 1-888-695-7148.

Effective January 1, 2020, the California Consumer Privacy Act (CCPA) allows California residents, upon a verifiable consumer request, to request that a business that collects consumers' personal information to give consumers access, in a portable and (if technically feasible) readily usable form, to the specific pieces and categories of personal information that the business has collected about the consumer, the categories of sources for that information, the business or commercial purposes for collecting the information, and the categories of third parties with which the information was shared. For more information about how we collect, use, and disclose personal information for business purposes, please review our [Privacy Policy](#). California residents also have the right to submit a request for deletion of information under certain circumstances. Consistent with California law, if you choose to exercise your rights, we won't charge you different prices or provide different quality of services unless those differences are related to your information. Contact us at support@sayvero.com for information on data subject rights requests and how to submit a request. Please note that you must verify your identity and request before further action is taken. As a part of this process, government identification may be required. Consistent with California law, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government issued identification, and the authorized agent's valid government issued identification.

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

services, and devices.

3. Your Rights. Please refer to the "Your Rights" section of the Privacy Policy.