

ESTATEGURU PRIVACY RULES

Effective as of 08.10.2017

1. General principles of processing of personal data

1.1. Unless otherwise specified in these privacy rules ("**Privacy Rules**"), any terms and expressions used in the EstateGuru User Terms shall apply to these Privacy Rules.

1.2 The portal operator shall process each user's personal data and information fairly, in accordance with any applicable laws and regulations and, in particular, the Data Protection Act 1998.

1.2. The portal operator and its employees shall treat each user's personal data as confidential, apply all diligence and security measures required by the law in the processing of a user's personal data to ensure only that such data is only used or disclosed for the purposes set out in these Privacy Rules and to protect the user's personal data against inadvertent or unauthorised use, disclosure or destruction.

1.3. The portal operator shall only permit access to the user's personal data to a restricted number of its employees who agree to keep the user's personal data confidential in accordance with any relevant confidentiality agreements entered into by them while employed by the portal operator and such confidentiality shall apply after the termination of any such employment. The portal operator shall not permit access of any unauthorised third parties to the user's personal data and the database of the portal operator containing such data.

2. The purpose of processing of personal data

2.1. The portal operator is legally authorised for the processing of personal data. The portal operator shall not process the user's personal data improperly or in a manner which is illegal.

2.2. The portal operator shall process personal data to ensure the welfare of the users, for the performance of the contracts entered into with and/or between the users.

2.3. The portal operator shall process a user's personal data:

2.3.1. To verify the identification of the user.

2.3.2. To assess the capability of the user to immediately meet its financial obligations under any relevant contracts.

2.3.3. To ensure that the user is able to immediately perform its contractual financial duties.

2.3.4. To enable the portal operator to deliver information to the user in relation to the portal operator's products and related promotional materials and/or notices, also the products and/or promotional materials and/or notices of the persons affiliated to or belonging to the same Group as



the portal operator or any of its third-party partners if the user has given his or her prior consent to the portal operator to provide such third-party partners with the user's personal data.

2.3.5. To analyse user satisfaction and preferences towards the products and services of the portal operator and its affiliates or persons belonging to the same Group as the portal operator in order to enable more effective product and service development and marketing activities.

2.4. The portal operator is entitled to process the user's personal data for such other purposes necessary for the performance of any relevant legal obligations or where the processing of such information is justified for performance of the contracts entered into with and/or between the users.

3. Personal data and processing

3.1. The processor of the personal data will be the portal operator:

EstateGuru Marketplace Limited

Registration Number: 09918265

Address: Aldgate Tower, 2 Leaman Street, London E1 8FA

E-mail info@estateguru.co

3.2. The collection, recording, retention, arrangement, use, amending, delivering, disclosure and deleting of the user's personal data by the portal operator, along with any other processing activities of personal data as permitted by the law is deemed to be the processing of the personal data.

3.3. The portal operator keeps a database with all users' personal data and other information, which shall include the following personal data of each user:

- First name and surname
- Personal identification code
- Date of birth
- Gender
- Residence and/or location
- Communication information (phone, e-mail, etc)
- Communication language
- Bank account information
- Data of identity document
- Family-related information
- Education and work-related information

- Financial data (incl information about income, debts and payment history, including information about persons financially associated with the user).
- Other information the user has provided to the portal operator or which the portal operator has collected about the user of its own initiative from legally permitted sources (incl via media and Internet).
- User's portal user data (user name, beginning and end of registration in the portal, etc).
- Information about the contracts entered into by the user via the portal and payment behaviour of the user under these contracts.

3.4. The portal operator may reflect other user related information in the user database if there is a justification for it with regard to the performance of obligations under any relevant contracts and if the processing of such data does not contradict the law.

3.5. From the moment the user has registered himself or herself as the user of EstateGuru, he or she is deemed as having given consent to the portal operator to process personal data of the user (including the transfer and disclosure of the user's personal data to the extent prescribed in clause 4 of these terms and conditions) in accordance with these Privacy Rules.

4. Transfer and disclosure of personal data

4.1. The portal operator is entitled to transfer the user's personal data primarily to:

4.1.1. third parties whose economic or professional activity includes valuation of credit capability or other equivalent activity (including credit information; payment default register);

4.1.2. credit institutions for the identification of the user;

4.1.3. persons whose economic or professional activity includes the provision of debt-collection services and other related services for the collection of contractual debt(s) of the user;

4.1.4. other users to facilitate the performance of obligations under contracts between the users;

4.1.5. persons to whom the portal operator is legally obliged to transfer the user's personal data; and

4.1.6. any person providing accounting services to the portal operator and persons providing legal assistance in connection with contracts entered into with or between the users.

4.2. The portal operator is entitled to transfer the user's personal data to third parties in circumstances not described in clause 4.1 of these Privacy Rules only when there is a justification to do so in order to ensure the performance of obligations under the contracts entered into with or between the users of EstateGuru and where the transfer of information to such a person shall not contradict the law.

4.3. If the user has separately given such consent to the portal operator, the portal operator is entitled to transfer the user's personal data (primarily the user's name and e-mail address) to the persons to

whom the portal operator has assigned a duty to market and promote the portal operator's products to the user.

4.4. In case of any financial debt(s) in relation to any contract(s) entered into by the user via the portal, the portal operator and/or persons described in clause 3.1.1 and/or clause 3.1.2 of these Privacy Rules is entitled to disclose the user's personal data (primarily the name, personal identification code/business ID, amount of debt) in a manner, by a procedure and via channels not prohibited by the law. The portal operator and/or the persons described in clause 3.1.1 and/or clause 3.2.2 of these Privacy Rules are entitled to disclose the user's personal data however they may not do so until the expiry of 30 (thirty) days from the commencement of the debt obligation. If the law requires consent of the user for the disclosure of the personal data, it is deemed that the user has given such consent to the portal operator or the persons indicated in clause 3.1.1 and/or clause 3.1.2 of these Privacy Rules upon registration by the user of EstateGuru.

4.5. Based on the contracts entered into/to be entered into, the portal operator agrees to oblige all third persons to whom user's personal data are transferred for the purposes described in this clause (4) to process each user's personal data only and exclusively for the purposes prescribed in this clause (4).

5. User rights and obligations in connection with processing of the personal data

5.1. The user agrees to transfer to the portal operator the required personal data described in these Privacy Rules which must be correct, valid and complete.

5.2. The user agrees to inform the portal operator immediately about any changes to his or her personal data, and also to inform the portal operator about the incorrectness or invalidity of personal data by delivering to the portal operator such correct and valid personal data to replace the incorrect and/or invalid data.

5.3. The user shall be fully responsible for the correctness and/or validity of his or her personal data during the whole period of their use of EstateGuru.

5.4. The user is entitled to demand information from the portal operator at any time about the personal data collected by the portal operator about him or her, also about the persons to whom the portal operator has delivered the user's personal data. To do so, the user should submit the relevant application **in writing** to the portal operator. The portal operator shall process the application within five (5) working days from receiving such application from the user. The portal operator is entitled to refuse to transfer the specified information in certain cases and to the extent provided by the law.

5.5. The user is entitled to demand the termination of the processing of his or her personal data by the portal operator, and the portal operator is obliged to terminate processing the user's personal data if the user has duly performed all obligations under the contracts entered into with the portal operator and/or another user and if the contracts entered into by the user with the portal operator and/or other



user have been terminated.

5.6. Despite the provisions in clause 5.5 of these Privacy Rules, the user is entitled to demand at any time, the termination of the processing of the user's personal data by the portal operator for the purposes described in clause 4.3 of these Privacy Rules.