

## Privacy Notice

Last updated: February 2025

UrbanBound, Inc. and its affiliates and subsidiaries (“**UrbanBound**”, “**we**”, “**us**”, or “**our**”) respect your privacy. This Privacy Notice (“**Notice**”) describes the processing of Personal Information (defined below) that is provided, collected, or disclosed while providing our products or services to you (“**Services**”) and on the websites and online platforms that link to this Notice (collectively, “**Site**”), including when you apply for a job with us. It also describes rights you may have under applicable laws. Please read this Notice carefully to understand our policies and practices regarding your Personal Information and how we will treat it.

Privacy laws and guidelines are part of a constantly changing environment. We reserve the right, at our discretion, to change, modify, add, or remove portions of this Notice at any time. All changes will be effective immediately upon posting to the Site or Services. Material changes will be posted on our Site or Services or otherwise communicated to you. You are responsible for reviewing this Notice periodically to ensure that you are aware of our current privacy practices.

### How We Collect Personal Information

“**Personal Information**” means information that uniquely identifies, related to, describes, or is reasonably capable of being associated with or linked to you. We collect personal information in the following ways:

#### *About Our Clients and Their Employees, Candidates, and Interns*

- *From you.* We collect information about you directly from you when you interact with us in person, telephone, email, chat, text message, or other digital communications. When you engage in certain activities on our Site or Services, such as creating an account, ordering a product or service from us or third party service providers, submitting content and/or posting content in discussion forums or on social media platforms where we have a presence, filling out a survey, posting a review on our website or on social media, sending us or third party service providers feedback, requesting information about our services, posting a video, or signing up for special offers from third parties through our website, we may ask you to provide certain information about yourself.
- *From your employer or potential employer.* When your employer or potential employer engages us on your behalf, they may provide us with information about you.
- *From other third-party sources.* We may receive information about you from our third-party service providers who help us to provide products and services to you, including our Site.
- *Automatically collected when you interact with the Site.* When you use our Site or click on links within our emails to confirm your account or to change a password, we and our third-party partners automatically receive, store, and analyze certain types of information about how you access and use the Site. Like many websites, we use cookies, location-identifying technologies, and similar technologies. For more information, please review the “*Cookies and Other Tracking Technologies*” section.

#### *About Our Service Providers*

- *From you.* We collect information about you directly from you when you interact with us in person, by telephone, or by email. We also collect information from you when you engage in

certain activities on our Site, such as requesting information about providing services from us or submitting an affiliate agreement.

- *From other third-party sources.* We may receive information about you from our third-party service providers who help us to provide products and services to you, including our website.
- *Automatically collected when you interact with our internal systems.* We may collect information about you when you use our internal systems.
- *Automatically collected when you interact with the Site.* When you use our Site or click on links within our emails to confirm your account or to change a password, we and our third-party partners automatically receive, store, and analyze certain types of information about how you access and use the Site. Like many websites, we use cookies, location-identifying technologies, and similar technologies. For more information, please review the “*Cookies and Other Tracking Technologies*” section. Depending on the purpose, some Personal Information we ask you to provide is mandatory and some voluntary. If you do not provide certain information, you may not be able to use some or all of our Services.

#### *About Users of Our Website*

- *From you.* We collect information about you directly from you when you interact with us in person, by telephone, or by email. We also collect information from you when you engage in certain activities on our Site, such as requesting information about services from us or submitting an affiliate agreement.
- *From other third-party sources.* We may receive information about you from our third-party service providers who help us to provide products and services to you, including our Site.
- *Automatically collected when you interact with the Site.* When you use our Site or click on links within our emails to confirm your account or to change a password, we and our third-party partners automatically receive, store, and analyze certain types of information about how you access and use the Site. Like many websites, we use cookies, location-identifying technologies, and similar technologies. For more information, please review the “*Cookies and Other Tracking Technologies*” section.

### **What Personal Information We Collect**

#### *About Our Clients and Their Employees, Candidates, and Interns*

Information about you we may collect from you, your employer or potential employer, or from third party sources includes:

- Name
- Home address
- Work Address
- Billing Address
- Shipping Address
- Email address
- Home telephone number
- Work telephone number
- Mobile telephone number
- Gender
- Age/Date of birth
- Provider Account number
- Marital status
- Username / password
- Frequent flyer / other affinity program numbers

- Social Security Number
- Medical history / health information
- Religion / religious beliefs

#### *About our Service Providers*

Information about you we may collect from you, your employer or potential employer, or from third party sources includes:

- Name
- Home address
- Work Address
- Shipping Address
- Email address
- Work telephone number
- Mobile telephone number
- Username / password
- Social Security Number

#### *About Users of Our Website*

We may use tracking technologies, such as cookies, pixels, and web beacons to collect the following information:

- IP or MAC address
- Device type
- Unique device identifier (UDID)/other device identifier (IMEI)
- Browser type
- Operating system or platform
- Name of Internet Service Provider (ISP)
- Referring website
- Exiting website
- Clickstream data
- Search terms entered on the Site
- Pages visited on the website(s)
- Time, date, and duration of visit to the website(s)
- Whether you open emails from us
- Links you click on in our emails and on our website, including ads
- Whether you access our website from multiple devices
- Other interactions you may have on our Site
- Location / geo-location (latitude/longitude, Wi-Fi / cell tower location, etc.)

WE DO NOT COLLECT OR STORE ANY FINANCIAL INFORMATION PROVIDED BY OUR CLIENTS. ALL PAYMENT PROCESSING SERVICES ARE PROVIDED BY OUR THIRD-PARTY PAYMENT PROCESSING VENDOR. The manner in which our third-party payment processing vendor uses, stores and discloses your information is governed by its own policies, and we have no control over, and therefore, no liability or responsibility for the privacy practices or other actions of such third party.

#### **How We Use Personal Information**

To the extent permitted by applicable law, we use Personal Information:

#### *About our Clients and Their Employees, Candidates, and Interns*

- *To provide our services to you.* For example, if you sign up for our newsletter, we will use the information you give us to send you our newsletter, and if you provide us with access to your account through our concierge services, we will use the information in your account to select and

schedule various services on your behalf. If you contact us with a question or a request, we will use your information to respond to your request.

- *To provide you with location-specific Services.* If you elect to share your location information with us, we may use that information to tailor options, functionality or offers related to your location. We also may use your IP address to determine your general location, which also may be used to tailor offers to you.
- *To offer and conduct promotions and contests.*
- *To conduct data analytics to support our website and business.* Typically, these analyses are done using aggregated or otherwise de-identified data. We use information, including automatically-collected information, to manage and improve our Site and our business. For example, we use such information to:
  - Manage our business needs, such as monitoring, analyzing, and improving the Services and the Site's performance and functionality. For example, we analyze user behavior on our Site and conduct research and analysis about the way you and other users use our Site.
  - Manage risk and protect the Site. We use data to better protect our Services, our Site, and you by helping to detect and prevent fraud and abuse of the Site and our Services.
  - Operate and improve our business.
  - Develop new products, services, and offers.
  - Tailor our offerings to your apparent interests.
- *To maintain our records.*
- *To market to you.* Information we collect about you and how you use and interact with the Site and our Services, ads, and other online content helps us to improve our Site and offer additional products and services that we think might interest you. For example, we analyze information about user interactions with our marketing emails and online ads (such as whether emails have been opened or whether ads are clicked on) to determine whether those communications and ads are effective, and to understand what other Site functionalities, products or services may interest you. We may send you marketing e-mails to ask whether you would like us to share your information with our third-party partners so they can market their services to you. For example, with your consent, we will share your Information with third-party realtors so they can assist you with your future home buying or renting needs.
- *For contractual and safety purposes.* We will use your information as necessary to enforce the terms of our Site, to comply with all applicable laws and regulations, to defend or protect us, our users, you, or third parties from harm or in legal proceedings, to protect our rights, to protect our security and the security of our users, employees, and property, to respond to court orders, lawsuits, subpoenas, and government requests, to address legal and regulatory compliance, to verify your identity or communications from you, to comply with contracts and other agreements to which we are a party, and to notify you of changes to our terms, policies, or practices.

- *To conduct internal monitoring and training.*
- *For other purposes for which you provide your consent.* For other purposes which are disclosed to you at the time your information is collected or for purposes which can be inferred from or are obvious given the circumstances of collection. For example, if you give us your personal information when entering a contest we will use that information to facilitate your participation in that contest.
- *For UrbanBound Roommate Exchange,* we may use certain information provided by your employer, such as name, email address, and phone number, to provide Roommate Exchange, a roommate matching service, within our app. We may disclose your name, email address, and phone number, to potential roommates, matched to you, through your employer's use of the Roommate Exchange service. You may opt out of having your information used to connect you with potential roommates through the service. If you choose to opt-out, your information, such as name, email address, and phone number will not be shared with your potential roommate.

#### *About our Service Providers*

- *To conduct due diligence prior to engaging in a business relationship.* Prior to engaging in a business relationship with you, we may conduct due diligence exercises, such as background checks and credit checks.
- *To meet our contractual obligations with you when we engage in a business relationship with you.*
- *To provide internal network access and systems to you.*
- *To provide our Site and its functionalities to you.*
- *To conduct data analytics to support our Site and business.* Typically, these analyses are done using aggregated or otherwise de-identified data. We use information, including automatically-collected information, to manage and improve our Site and our business. For example, we use such information to:
  - Manage our business needs, such as monitoring, analyzing, and improving the Services and the Site's performance and functionality. For example, we analyze user behavior on our Site and conduct research and analysis about the way you and other users use our Site.
  - Manage risk and protect the Site. We use data to better protect the Services, our Site, and you by helping to detect and prevent fraud and abuse of the Services and our Site.
- *To operate and improve our business.*
- *To maintain our records.*
- *For legal, contractual and safety purposes.* We will use your information as necessary to enforce the terms of our Site, to comply with all applicable laws and regulations, to defend or protect us, our users, you, or third parties from harm or in legal proceedings, to protect our rights, to protect our security and the security of our users, employees, and property, to respond to court orders, lawsuits, subpoenas, and government requests, to address legal and regulatory compliance, to

verify your identity or communications from you, to comply with contracts and other agreements to which we are a party, and to notify you of changes to our terms, policies, or practices.

- *To conduct internal monitoring and training.*

## **How We May Disclose Personal Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose your Personal Information with your consent or in the following circumstances:

- *Employees and Other Personnel* – We may share your Personal Information with our employees and personnel (such as contractors) who have a need to know the information for our business purposes.
- *Affiliates and Subsidiaries* – We may share your Personal Information with our family of companies for their and our business and marketing purposes, including providing you with information about the Services we think may be of interest to you.
- *Service Providers* – We may disclose your Personal Information with service providers that we use to support our business, including but not limited to, data analytics providers, website hosting providers, and other technology providers. If you are applying for a job with us, this may include service providers such as background check providers and human resource providers.
- *Business Partners* – We may disclose your Personal Information with trusted business partners. For example, we may disclose your Personal Information with a company whose products or services we think may be of interest to you or who we co-sponsor a promotion or service with.
- *Marketing Partners* – We may share your Personal Information with our third-party marketing partners so they can market their services to you (e.g., realtor partners so they can assist you with your future home buying or renting needs). When we share your Personal Information in this context, we follow applicable legal requirements, which may require that we provide opt-out rights or other individual rights.
- *Legal Obligation or Safety Reasons* – We may disclose your Personal Information to a third party when we have a good faith belief that such disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of any agreement you have with us, (c) detect, prevent, or otherwise respond to fraud, security, or technical concerns, (d) support auditing and compliance functions, or (e) protect our rights, property, safety, our employees and other customers, and the public against harm.
- *Merger or Change of Control* – We may disclose your Personal Information to third parties as necessary if we are involved in a merger, acquisition, or any other transaction involving a change of control in our business, including but not limited to, a bankruptcy or similar proceeding. Where legally required, we will give you notice prior to such disclosure.
- *Other* – We may disclose your Personal Information to third parties when explicitly requested by or consented to by you (including, to authorized users of your account at your discretion), or for

the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure).

## **Cookies and Other Tracking Technologies**

We and our service providers may use cookies and similar technologies to collect usage and browser information about how you use our Site. The technologies we use for this automatic data collection may include cookies and web beacons that permit us to verify system and server integrity and generate statistics around the popularity of certain content. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of our Site, to enhance your experience through personalization, and to help us better understand the features of our Site that you and other users are most interested in.

*Website Analytics and Session Replay* – We use analytics and session replay services, that use cookies and other technologies that collect your Personal Information, to assist us with analyzing our Site traffic and site usage to optimize, maintain, and secure our Site and inform subsequent business decisions (including, e.g., advertising). These include, but are not limited to, the following third-party services:

- *Google Analytics* – To learn more about how Google uses data, visit [Google’s Privacy Policy](#) and Google’s page on “[How Google uses data from sites or apps that use our services.](#)” You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

*Interest-Based Advertising* – We may also allow or enable third parties to collect Personal Information to provide their interest-based advertising on behalf of our products and Services, or their own. Interest-based advertising occurs when advertisements are shown to you based on information collected from your online interactions over time and across multiple websites, devices, or online services that you visit or use. Some companies may engage in cross-context behavioral advertising to predict your preferences and show you advertisements that are most likely to be of interest or relevant to you. We do not control these third parties’ collection or use of your information for these purposes, or the opt-out options they may individually offer you via their terms, conditions, and privacy policies. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For example, we engage Google Analytics and Google Ads for interest-based advertising purposes.

*Selling or Sharing Personal Information* – While we do not sell Personal Information in exchange for monetary consideration, we do share Personal Information for other benefits that could be deemed a “sale” or “sharing” under various data protection laws, because they are sometimes broadly defined to include activities such as the delivery of interest-based advertising on websites or allowing third parties to receive certain information, such as cookies, IP addresses, and/or browsing behavior. We similarly engage in interest-based advertising when we use data about your activities on our Site to serve you ads on websites owned or controlled by third parties. It is in this context that we have provided advertising networks, and data analytics providers with Personal Information such as your IP address, device information, Internet and other electronic network activity information, and geolocation information in the last twelve (12) months.

*Cookie Choices* – Most web browsers automatically accept cookies, but you can change your browser’s settings to disable all or certain cookies if you wish. For more information on how to manage browser cookies, see <http://www.allaboutcookies.org>. Please note that by disabling or deleting cookies, you may not be able to access the full functionality of our Site. Disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set.

Some of the third parties that we may work with may participate in the Digital Advertising Alliance's self-regulatory program, which provides consumers tools to opt-out of receiving interest-based advertising.

### **How Long We Keep Your Personal Information**

We will keep your Personal Information for the period necessary to fulfill the purposes described in this Notice, unless a longer retention period is permitted or required by law.

In specific circumstances, we may store your Personal Information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

### **Links to Third-Party Websites**

We are not responsible for the practices employed by any websites or services linked to or from our Site, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be handled in accordance with the applicable third-party's privacy policy. For clarity, we shall have no liability whatsoever related to your access, use, or interactions with the third-party websites or services linked to or from our Site.

In some cases, we offer links to social media platforms (like Facebook, Instagram, Pinterest, and X (formerly known as Twitter) and YouTube that enable you to easily connect with us or share information on social media. Any content you post via these social media pages is subject to the terms of use and privacy policies for those platforms. For more information about how YouTube collects and processes Personal Information, for example, please see [Google's Privacy Policy](#).

### **International Use and Cross-Border Data Transfers**

If you are visiting our Site from outside of the United States, please note that our Site is hosted in the United States. Where permitted by applicable law, we may transfer the personal data we collect about you to the United States and other jurisdictions that may not be deemed to provide the same level of data protection as your home country, as necessary for the purposes set out in this Notice.

### **How We Protect Personal Information**

We have implemented commercially reasonable measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the Internet is not completely secure. Despite these efforts to store Personal Information in a secure environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems.

### **Children's Privacy**

We do not knowingly collect or solicit any Personal Information from children, as defined under applicable law, without verified written parental consent, and we have no actual knowledge of selling such Personal Information of minors under sixteen (16) years of age. If we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you believe we might have any information from or about a child, please contact us using the contact information listed below.

### **Exercising Your Privacy Rights**

Depending on where you live, you may have the following rights with respect to your Personal Information under applicable data protection laws:

- *Access* – The right to request access to and obtain a copy of any Personal Information we may have about you.
- *Deletion* – The right to delete your Personal Information that we have collected or obtained, subject to certain exceptions.
- *Correction* – The right to request that we correct any inaccuracies in your Personal Information, subject to certain exceptions.
- *Opt-Out of Certain Processing* – The right to: (a) opt-out of the processing of your Personal Information for purposes of targeted advertising, (b) opt-out of the sale or sharing of your Personal Information, (c) limit the use of your sensitive Personal Information (if applicable), and (d) opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.
- *Objection/Restriction of Processing* – The right to object or restrict us from processing your Personal Information in certain circumstances.
- *Withdraw Consent* – The right to withdraw your consent where we are relying on your consent to process your Personal Information.
- *Automated Decision-Making* – The right to know when you are subject to automated decision-making, the Personal Information used to render the decision, the principal factors and parameters involved in the decision, and human review or correction of the decision (or its underlying data, where appropriate). You may also have the right to consent or opt-out of this automated decision-making, depending on your location.

To exercise any of the privacy rights afforded to you under applicable data protection laws, email us at [compliance@urbanbound.com](mailto:compliance@urbanbound.com). You can opt-out of receiving future promotional email messages from us by following the opt-out instructions provided in any such message you receive. Please note that it may take up to fourteen (14) business days to process your request. Please also be aware that we may continue to send you transactional, administrative, and marketing communications, such as emails confirming your transactions with us, and notices regarding changes to this Notice or our terms of use. You will not be discriminated against in any way by virtue of your exercise of the rights listed in this Notice. However, should you withdraw your consent or object to processing of your Personal Information, or if you choose not to provide certain Personal Information, we may be unable to provide some, or all, of our Services to you.

Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information. We must verify your identity before fulfilling your requests, and if we cannot verify your identity we may request additional information from you. If you are an authorized agent making a request on behalf of another person, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney. We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to your requests unless they are excessive or repetitive. If we determine that a request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may deny certain requests, or only fulfill some in part, as permitted

or required by law. If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

**California Residents**

This Section provides additional information regarding our practices pursuant to the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (collectively, “CCPA”), where “**Personal Information**” has the definition set forth in the CCPA.

Please see the chart below for detailed information about the categories of Personal Information we have collected from California residents during the twelve (12) months preceding the date on which this Notice was last updated and the categories of third parties to whom we sell or share Personal Information. For each category of Personal Information set forth in the chart below, the categories of third parties to whom we disclose it for a business or commercial purpose are set forth in the *How We May Disclose Personal Information* section above.

<b>Personal Information Category set forth in Cal. Civ. Code § 1798.140</b>	<b>Categories of Third Parties to Whom We Sell or Share Personal Information</b>
<b>Personal identifiers</b> , including real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers.	We sell names and email addresses to our marketing partners. We share this category of Personal Information with third parties for purposes of cross-context behavioral advertising.
<b>California Customer Records Personal Information</b> (Cal. Civ. Code § 1798.80(e)), including name, signature, physical characteristics or description, address, telephone number, education, employment, employment history, etc.	We sell names and email addresses to our marketing partners. We do not share this category of Personal Information.
<b>Characteristics of protected classifications</b> under California or federal law. This may include age, veteran status, accommodations information, gender identity and expression, sexual orientation, and religion.	We do not sell or share this category of Personal Information.
<b>Commercial information</b> , including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	We sell names and email addresses to our marketing partners. We share this category of Personal Information with third parties for purposes of cross-context behavioral advertising.
<b>Internet and other electronic network activity information</b> , including, but not limited to, browsing history, search history, and information about individual interactions with an Internet website, application, or advertisement.	We do not sell this category of Personal Information. However, we share this category of Personal Information with third parties for purposes of cross-context behavioral advertising.
<b>Geolocation data</b> , such as your IP address.	We sell names and email addresses to our marketing partners. We share this category of Personal Information with third parties for purposes of cross-context behavioral advertising.

<b>Sensitive Personal Information as set forth in Cal. Civ. Code § 1798.140</b> , including social security number, religion/religious beliefs, gender, or account access credentials (like usernames or account numbers combined with password or other security/access code to access an account).	We do not sell or share this category of Personal Information.
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*California Shine the Light* – Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of Personal Information to third parties for the third parties’ direct marketing purposes, if any. To make such a request, please contact us at [compliance@urbanbound.com](mailto:compliance@urbanbound.com). Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

**Contact Us**

If you have any questions about our practices or this Notice, please contact us at [compliance@urbanbound.com](mailto:compliance@urbanbound.com).