

Privacy Policy

Last updated: 26 March 2022

Thank you for using Rentwlo and being part of our community!

Rentwlo's mission is **“To inspire new trends in home rentals – one apartment, one person, one city at a time.”** Rentwlo exists to make renting a home easy, faster and with lower costs. We are a community built on principles like honesty, respect, integrity and trust. We strive for accuracy of information and transparency, and we work to earn your trust. It is essential for us to be clear about how we use your information and protect your right to privacy.

This Privacy Policy describes how **Rentwlo, Lda** ("**Rentwlo**," "**we**," "**us**," or "**our**"), with NIF 516412493 and AMI license n. 19255, with registered office at Avenida de Pádua, nº 3, Edifício 1, Bloco B, Loft -1/0 F, 1800-294, Lisboa, handles personal information that we collect mainly through the Rentwlo Platform in <https://www.rentwlo.com/>, or, <https://www.rentwlo.com/pt/>, and within the scope of its professional activity, including events, marketing campaigns, or others.

1. Definitions

For the purposes of this Privacy Policy:

- "**Account**" means a unique account created for you to access our Services or parts of Our Platform.
- "**Cookies**" are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.
- "**Device**" means any device that can access the Rentwlo platform such as a computer, a cell phone or a digital tablet.
- "**Personal data**" is any information that relates to an identified or identifiable individual.
- "**Service(s)**" refers to the Rentwlo platform and its services.
- "**Service Provider**" means any natural or legal person who processes the data on behalf of Rentwlo. It refers to third-party companies or individuals providing services for Rentwlo to facilitate Our Services, provide Services on behalf of Rentwlo, perform services related to Our Services or to assist us in analysing how Our Platform is used.
- "**Usage Data**" refers to data collected automatically, either generated by the use of the Platform or from the Service infrastructure itself (for example, the duration of a page visit).
- "**Website**" refers to the Rentwlo suite of applications or websites, collectively the "**Rentwlo Platform**", "**Platform**" or "**Site**".
- "**You, you**" means the individual accessing or using the Rentwlo Platform, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Terms that are not defined in this Privacy Policy have the same definition as in our **Terms of Service** ("**Terms**").

2. Framework

This Privacy Policy forms part of Rentwlo's policies, which you accept in their entirety and form an integral part of our **Terms of Service**.

For the purpose of this Policy, we assume that you have read, understood and agree with our Terms of Service.

We use your personal data to improve the Rentwlo platform and provide you better services. By using our platform, you agree to the collection and use of information in accordance with this Privacy Policy. If the

user or member of our platform does not agree with any of them, the user must immediately cease its use of the Rentwlo platform.

Our Privacy Policy is applicable to all use and treatment of data carried out under the exercise of our activity.

It applies exclusively to the websites and applications (in general 'Rentwlo Platform') owned by Rentwlo and under our management and responsibility.

The personal data you provide us during the interaction with the various services will be treated with the guarantees of security, confidentiality required by the legal framework on the protection of personal data, in compliance with European legislation, the GDPR.

In Portugal, the processing of personal data is governed by Law 67/98 of 25 October on the Protection of Personal Data.

Any attempts to alter the information, or any other action that may cause damage and put at risk the integrity of the system, are strictly prohibited in accordance with the legislation in force. The user undertakes to scrupulously comply with the applicable legislation, particularly with regard to computer crime and intellectual property rights, and is solely responsible for the infringement of these regulations.

3. Personal Information We Collect

3.1. Information needed to use the Rentwlo Platform

In order to access our dashboard services, namely to make booking requests or create ads, and to manage a booking request, as well as access to all functionalities, we require the following data from our users:

- **Registration Data:** Username, Password, and Email address.
- **Profile Data and Verifications:** Profile Picture, First Name, Last Name, Fiscal number, Personal Address, Information on the languages spoken by the User, Current Employer, Position in Company, In Company since, a BIO text area (Biography), Email Address, Telephone Number, ID document (National Card, or Passport). The User ID document may contain other information such as gender, date of birth and/or other personal numbers.

3.2. Information we collect through the use of the Rentwlo Platform

- **Booking Data (“Required Documents”):** These are documents requested to the Guest at the time of making a Booking Request. They can be: User Identification document (National Card, ID, or Passport), Proof of Income, Personal Video. These documents are shown to the Supplier/Host on the Booking Page for their review.
- **Messages:** The information and documents that Guests and Hosts exchange via message. All information exchanged between Guests and Hosts is only accessible to both parties and Rentwlo.
- **Other data or documents:** During the course of a Booking Request, the Host may ask the Guest for some other information and/or documents. Such request is made, sent and received, through the Rentwlo Platform internal messaging system, in the form of a message and/or attachment to the same. This information shall remain on our servers.
- **Reviews, Comments, Forms:** Some information may be collected when you make a review, post a comment and when you fill in some form, such as the contact form, and/or others available on our platform.

3.3. Invoice and Payment Information

- **Invoice data:** For issuing correct invoices the following personal or company data may be collected, First Name, Last Name, Fiscal or VAT number, Address.
- **Payment Details:** In order to make payment to Hosts, or to process refunds, the following personal or company data may be collected, For MB-WAY: Telephone Number

For WIRE TRANSFER: Bank Name, IBAN, Account Number, SWIFT/BIC, Bank Address.

3.4. Optional Information

Information you choose to give us.

- **Profile Data:** Emergency Contact data, like Name, Relationship, Email, Phone.
- **Social Networks:** the user can enter links to their profiles on the various social networks.

3.5. Information Automatically Collected by Using the Rentwlo Platform

Data collected automatically when using our platform.

- **Usage Data:** The pages or content from our site that you view, listings viewed, listing searches, bookings made and other actions taken in the Rentwlo platform.
- **Log Data:** May include information such as your device's Internet Protocol address (e.g. IP address), browser type, browser version, the time and date of your visit, the time spent on individual pages, pages you viewed before or after using Rentwlo platform, how you accessed Rentwlo platform and if you clicked on links to third party applications, cookie data, unique device identifiers and other diagnostic data. We may collect this information even if you haven't created a Rentwlo account or logged in.
- **Device Information:** Including, but not limited to, the type of device you use, your device unique ID, IP address, operating system, hardware and software information, Internet browser you use, other information that your browser sends whenever you visit our platform or when you access our platform by or through a mobile device, unique device identifiers and other diagnostic data.
- **Geo-location Information:** Precise or approximate location from your IP address or mobile device's GPS.
- **Tracking Technologies, Cookies and Similar Technologies as described in our [Cookie Policy](#).**
- Payment information. Such as used payment gateways and transaction values.

For more information about the cookies we use and your choices regarding cookies, please visit our [Cookie Policy](#).

3.6. Non-personal information we collect through the use of the Rentwlo Platform

- **Property Data (Ad or Listing data):** All property details required to display your ad, such as detailed property description and features, energy certificate, photos, plans and videos, price and expense information, detailed address, approximate or exact location on map, and calendar availability, neighbourhood information and/or other information you choose to share.

3.7. Data from Minors

In summary: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to minors. By using the Website, you declare that you are at least 18 years old or that you are the parent or guardian of a minor and consent to use of the Website by a dependent minor. If we learn that personal information has been collected from users under the age of 18, we will deactivate the account and take reasonable steps to promptly delete such data from our records. If you become aware of any data that we may have collected from children under the age of 18, please contact our Officer.

4. How We Use Your Information

Rentwlo uses your personal information to:

Provide, maintain and improve the Rentwlo Platform. Such as:

- To maintain service, allow you to access our platform, functionalities, products and services, allow you to use them in accordance to the purpose they were designed for, and monitor platform usage.
- To manage your account: manage your registration and access to services as a user of the platform.
- Enable you to communicate with other members.
- Research and Development to improve functionalities and develop new products and services.
- Provide support to members and manage your requests.
- To contact you by email, by telephone, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services. An example are emails and/or messages and alerts about the activity in your account, progress of your bookings, posting of advertisements as well as other activities.
- Also, send you security alerts and information on security updates, when necessary or reasonable for their implementation.
- Improve user experience and possibly personalize your experience by serving you tailored content.

Create an Environment of Trust. By means of:

- User information provided in user profile and verifications.
- Verification, review and in some cases approval/rejection of information provided.
- Monitor content, authenticity of information and user interaction and communications in the platform.
- Monitor adequate usage of our functionalities.
- Resolve member disputes, namely between guests and hosts. This may involve sharing data with members in order to achieve or aid on resolution.
- Comply with our legal obligations, protect the health and well-being of our guests, suppliers, members and users.

Monitoring the Authenticity of Information, Risks and Fraud, Enforcement of our Terms of Service

- We may access and review your documents and information on the Rentwlo Platform to verify their authenticity, perform analysis of your communications and messages, perform security and risk assessments and checks, prevent and detect fraud, bad faith, illicit purposes, illegal and malicious activities, regulatory compliance, research, or use other legal means, to verify and enforce our Terms of Service.
- Performance of a contract: the development, compliance and undertaking of the purchase contract for the products and services you have purchased, or of any other contract with us, through the platform.
- Conduct checks against databases and other information sources, including background or police checks.
- We may also conduct profiling, when justified due to the suspicion of illicit behaviour, bad conduct or temperament, use of non acceptable language, threats, fraud or other similar motives, based on user interactions in the Rentwlo platform, or received complaints, and any other first-hand or third-party information we may have.
- Comply with the law, respond to inquiries, protect our rights.

Advertising and Marketing

- We may send you promotional, special offers, marketing, advertising and other information about Rentwlo's services and functionalities in general, and or in particular about matters which we think may be of interest to you, unless you have opted not to receive such information.
- Personalize, measure, and improve our advertising. Data analysis, identify usage trends, determine the effectiveness of our promotional campaigns.
- Possibly be able to personalize your experience by serving you tailored advertising and content.

Business Reasons

- **For business transfers:** We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganisation, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about our users is among the assets transferred.

5. Sharing and Disclosure

5.1. Sharing between members

Some information may be shared between guest and host.

When a booking request is made and during the reservation process, such as:

- Photographs or pdfs of identification documents, proof of income, personal video, or others that may be requested between the parties and exchanged between both, with the acceptance of both, in confidentiality, with a view to approval of the booking request, drawing up the rental contract, and completion of the rental.
- These documents, if requested when making a booking request, are available on the booking page. If requested via message, are available in messages.
- Near check-in date, for confirmed bookings, to facilitate contact between the parties, we share the following information: first and last name, profile link, email and phone number. We also send to the guest the address of the property.
- If a host asks us for more information about a guest, we may share in confidentiality the data we have available in order to facilitate the host's decision making. This may include certain non-public information such as booking and cancellation history, past disputes, information about the guest's personality, or other information that we choose to share.

5.2. Information that is Public in the platform

The following information is public on your profile

- Profile picture, first and last name, company, position, since, BIO, languages spoken, profile status, reviews, ratings, and, for hosts, published ads.
- In the BIO (Biography) the user is free to place the information he wishes to be read about himself.

The following information is public in your add (listing)

- **Personal information:** Profile picture, first name, languages spoken, a short phrase "happiest when", link to profile and reviews, ratings and/or comments.
- **Property information:** Ad title, description and features, photos, floor plans and videos, pricing information, house rules and landlord policies, approximate or exact location on map, calendar availability, neighbourhood information, guest reviews, ratings, and other information you decide to share.

Third party platforms and applications

- On third party websites, like for example social media platforms and applications, or others, we may display part of your profile or advertisements in order to better advertise Rentwlo's services and assist you in conducting your business.

5.3. Sharing with suppliers or co-workers, improvement of Rentwlo's technology and services

In order for Rentwlo to perform its work fully, and only to the extent necessary, for activities such as, but not limited to, property acquisition, photographic services, advertising our services, or otherwise, our suppliers and internal or external collaborators, may need to collect, have access and manage Guest and Host contact details, property characteristics and location data, as well as other data such as the specific needs of each member, services required, etc., in order for us to better serve each client and everyone in general, and for Rentwlo to adapt, optimise and improve its technology and service level.

Any Rentwlo supplier, service provider or employee is contractually obliged to protect our Users' information and data, not disclose and maintain strict confidentiality and only using it for the purposes to which they report, in accordance with their mission for Rentwlo.

We may share your personal information in the following situations:

- **With Service Providers:** We may share your personal information with Service Providers to monitor and analyse the use of our Platform, for payment processing, or to contact you.
- **For business transfers:** We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **With Affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **With business partners:** We may share your information with our business partners to offer you certain products, services or promotions.
- **With other users:** when you share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose your personal information for any other purpose with your consent.

5.4. Business Transactions

If the Company is involved in a merger, acquisition or asset sale, your personal data may be transferred. We will provide notice before your personal data is transferred and becomes subject to a different Privacy Policy.

5.5. Complying with the Law

Legal Obligations: We may disclose your information when we are legally required to do so, to comply with applicable law, government or government agency requests, a lawsuit, court order, or legal process, such as in response to a court order or subpoena (including in response to public authorities to comply with national security requirements, criminal investigations, illegal activities, money laundering, or any other law enforcement).

If required by tax authorities, we may be required to disclose data such as: Guest and Host reservation and accommodation data, property and occupancy data, and transaction data.

5.6. Other legal requirements

Rentwlo may disclose your personal data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend our rights or property
- Prevent or investigate possible wrongdoing in connection with our platform and services
- Protect the personal safety of platform users, members or the public
- Protect against legal liability

5.7. Integrations with External Partners

Rentwlo uses integrations with other partners such as:

- **Google Services:**
 - **Google Maps/Google Earth and YouTube:** Your use of these services is subject to the respective privacy policies of those providers, such as **[Additional Google Maps/Google Earth Terms of Use](#)** and **[GOOGLE'S PRIVACY POLICY](#)**. See also **[here](#)** how Google treats your information.
 - **YouTube:** Our website uses an API interface and cookies from YouTube, which is operated by Google.

- **Google Web Fonts:** For uniform font representation, our site uses web fonts provided by Google. Google Fonts is bound by [Google's generic API terms of service](#) and it may track user behaviour.
- **Search Console:** For tools and reports that help measure our site's Search traffic and performance, fix issues and improve Google Search results.
- **Tag Manager:** Allows us to manage and deploy marketing tags (snippets of code or tracking pixels).
- **Analytics:** Web analytics service offered by Google that tracks and reports website traffic.
- **Weglot:** We also use an integration with Weglot (see website [here](#)) for the translation of all site content into several languages. See here the [WEGLOT Privacy Policy](#).
- **Vimeo:** Our website uses features provided by the Vimeo video portal. Please see here the [Vimeo Privacy Policy](#).
- **PayPal:** Use of the PayPal payment platform is subject to PayPal's policies. View the [PayPal Privacy Statement](#). See here the [Terms and Conditions for PayPal Services](#).
- **AIOSEO:** for SEO development and improvement. See here the [AIOSEO Privacy Policy](#).
- **CookiesYes by WebToffee:** for Managing cookie consent. See here the [WebToffee Privacy Policy](#).

Rentwlo does not own or control these third parties and when you interact with them you are providing your information to them.

5.8. Detailed Information on the Processing of Your Personal Data

The Service Providers we use may have access to your personal data. These third-party vendors collect, store, use, process and transfer information about your activity on our Platform in accordance with their Privacy Policies.

Analytics

We use third-party Service providers to monitor and analyse the use of our platform.

- **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Platform. This data is shared with other Google services. Google may use the collected data to contextualise and personalize the ads of its own advertising network.

You can opt-out of having made your activity on our Platform available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>

For details on the cookies used by Google, please see our [Cookie Policy](#).

6. How long we keep your information

Rentwlo will retain your personal data only for as long as is necessary for the purposes set out in this Privacy Policy and our Terms of Service.

In general terms, we will not normally delete any information or data from our platform unless requested to do so by you.

We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Rentwlo will also retain log and usage data for internal analysis purposes. Log and usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Platform, or we are legally obligated to retain this data for longer time periods.

Rentwlo can delete your data due to any reason necessary, like for example due to data size, performance constraints, policy infringement, etc.

In the event of a request to delete your data (deletion of your account), if required or permitted by law we may retain your information for a longer retention period (to comply with applicable laws, tax law, accounting or other legal or security requirements).

See also paragraph 9.2 Deletion of data.

7. Transfer of Your Personal Data

Your information, including personal data, is processed at Rentwlo's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Rentwlo will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

8. Links to Other Websites

Our Platform may contain links to other websites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

9. Your Rights

The Rentwlo user and member can exercise their rights, as described in this section, regarding the way their data is handled, requiring them to identify themselves when making their request.

9.1. Rights

You have the following rights:

Accessing and Managing your information

- You may access the platform and in Panel update or manage all your data at any time, the user being responsible for the authenticity and updating of your information.
- You can Request a copy of some or all of your data at Rentwlo.

Data portability

- You can request a copy of your data which we will provide to you in a structured machine-readable format, and to request its transfer to another company/organisation.

Opposition

- You may ask Rentwlo not to use your data for a certain type of processing or use.

Complaint

- If you think that your data is not being processed in accordance with the legal provisions you can lodge a complaint with the supervisory authority. In Portugal this is the **Comissão Nacional de Proteção de Dados**.

Data deletion (without termination with Rentwlo)

- In order to comply with our Terms of Service, some information or sections namely in Dashboard/ Profile (where your data is located) cannot be deleted. If you replace this information with invalid information you will be violating our Terms of Service.
- You also cannot delete your reservations or bookings, as well as the information contained therein, of an informative nature, contractual, price list and/or documents and personal information submitted and part of the respective requests.
- There is a solution to have all your data deleted, make a cancellation request (deletion of account). See next item.

Request for Termination / Exclusion / Forgetting

- If you no longer wish to use Rentwlo you may make a cancellation request to us, to which we will respond in accordance with, and as mentioned in, our Terms of Service.
- By making this request your Rentwlo account will be closed and all your personal information deleted. This deletion will be permanent and your account and data will not be possible to restore.

9.2. Deletion of data

When requesting that your personal information be deleted, please note the following:

- We may retain your information or data to comply with our legal obligations (tax, accounting or other legal requirements).
- We may retain your information or data for legitimate security and fraud purposes in order to enforce our Terms of Service, in particular vis-à-vis users with whom we had problems in the past, or there is suspicion or knowledge of bad intentions, illegal or harmful behaviour.
- Information, comments, reviews, or other information that is of public domain will continue to be published, but you will no longer have access to its management.
- As we have in place measures for data protection and restitution of our database, such as protection from accidental or malicious data loss, your personal information may not be removed from our backup systems for an extended but limited period of time.

10. Security

No organisation or system is perfect and will guarantee absolute security. However Rentwlo takes the technical and organisational steps it considers reasonable and is constantly improving its practices, systems and technology to help us protect your information.

11. Amendments

We may update Our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and update the "Last updated" date at the top of the Privacy Policy.

Substantial changes:

We will let you know via email and/or a prominent notice on Our Platform, prior to the change becoming effective and update the "Last updated" date at the top of the Privacy Policy.

Substantial changes are all changes which effectively change the way we use, manage, process or disclose your data, or to comply with applicable laws and regulations.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

12. Contact Information and Rentwlo Officer

If you have questions or comments about privacy, our privacy policy, or the way your data is used, you can contact our Data Protection Officer (DPO), Paulo Guerreiro, by email at privacy@rentwlo.com, or by phone at **+351 937141122**, or by post at:

RENTWLO, LDA
PAULO GUERREIRO

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