GUEST PRIVACY NOTICE

This Guest Privacy Notice explains how Blueground processes the personal data ("Guest Personal Data") of individuals who apply for, book or occupy a Blueground apartment, including an apartment offered through Blueground's partner network, and co-occupants named in a booking (the "Guests", each a "Guest"). This Notice supplements and forms part of Blueground's Privacy Policy, available at https://www.theblueground.com/privacy. It provides additional information that applies specifically to Guests, including information about the controller of Guest Personal Data, the categories of personal data processed, the purposes and applicable legal bases for such processing, specific retention periods, and the parties to whom Guest Personal Data may be disclosed. If this Notice and the Privacy Policy differ on a point that concerns Guest Personal Data, the more specific statement in this Notice applies.

1. Identity of the Data Controller

The controller of Guest Personal Data, being the entity that determines the purposes and means of processing Guest Personal Data in connection with the provision of Blueground's property leasing services, is the Blueground group company that is, or is proposed to be, the Guest's contracting party under the lease or sublease agreement (the "Agreement"). The entity's registered office, contact details, and other relevant particulars are set out in the Agreement. Before an Agreement is signed, this is the Blueground company operating in the country where the property is located. Where the Guest books an apartment offered through Blueground's partner network (a "Partner Apartment"), the partner that provides the Partner Apartment is a separate independent controller of the Guest Personal Data it receives from Blueground.

2. Categories of Personal Data Processed

For the purposes of entering into and performing the Agreement, providing and administering the property leasing services, and complying with applicable legal obligations, Blueground may process the following categories of Guest Personal Data, as applicable:

- Identification data: full name, date and place of birth, nationality, and identification document details and copies, such as identity card, driver's licence or passport number and issuing authority, and, where applicable, social security number.
- Contact information: residential address, email address, telephone number and, where the Guest provides them, emergency contact details.
- Financial and tax information: bank account and payment details, payment history, and tax identification number.
- Contractual and tenancy information: details of the Agreement, rental and other payments, tenancy or occupancy details, correspondence, notices, and related documentation.
- Verification and due diligence information: information required to verify the Guest's identity, eligibility, authority, or other relevant circumstances in connection with the provision of the services.
- Communication and support information: records of communications with Blueground, including emails, written correspondence and telephone calls, where recorded in accordance with applicable law, together with related metadata, such as the date, time and duration of communications, where

necessary for customer support, quality assurance, dispute resolution, or the protection of Blueground's legitimate interests.

- Technical and usage information: electronic identifiers and other technical information generated through the Guest's use of Blueground's systems, platforms or services.
- Access and security information: access logs, identifiers, images or other information collected through building security, surveillance or access-control systems, where applicable and as permitted by law.
- Accessibility and accommodation information: where voluntarily provided by the Guest, information concerning a disability, health condition, or other circumstance relevant to a request for specific accessibility features or accommodations in connection with the property or services.
- Other information: any other information provided by the Guest directly and, where applicable, from the person or company that makes a booking on the Guest's behalf (such as an employer or a relocation agent), from other Guests named in the same booking, from identity verification providers and, in the United States, tenant screening providers. Where a Guest provides personal data of another person (such as a co-occupant, including a minor, or an emergency contact), the Guest should inform that person and make this Notice available to them.

3. Purposes and Legal Bases of Processing

Blueground processes Guest Personal Data for the purposes set out below. The legal basis applicable to each processing activity will depend on the relevant circumstances and applicable data protection law. The identification of a specific legal basis for each purpose reflects Blueground's compliance with the GDPR, the UK GDPR, and other data protection laws that require such identification. Where the applicable law in a given jurisdiction does not require or recognise an equivalent concept, the legal basis indicated below is provided for the purpose of transparency and does not constitute a representation that such a requirement applies under that jurisdiction's law.

3.1. Performance of the Agreement and Pre-Contractual Activities

Blueground processes Guest Personal Data that is necessary to enter into and perform the Agreement and to provide and administer the property leasing services. This may include administering the Guest's tenancy, managing the contractual relationship, fulfilling Blueground's obligations under the Agreement, and taking steps at the Guest's request prior to entering into the Agreement. The applicable legal basis for this processing is the necessity of the processing to enter into or perform the Agreement, or to take steps prior to entering into the Agreement.

3.2. Identity Verification, Screening and Fraud Prevention

Blueground may process Guest Personal Data to verify the Guest's identity and eligibility, prevent and detect fraud, protect its properties and services, and assess information relevant to the provision of property leasing services. Blueground uses specialized third-party service providers to perform identity verification and screening checks. Depending on the verification process, this may involve

government-issued identification documents, photographs or selfies, information extracted from identification documents, and other information necessary to verify the Guest's identity. Copies of identification documents are kept, for the period stated in Section 4, as evidence that the Guest's identity was verified and for dealing with fraud and disputes.

The applicable legal basis for identity verification and fraud prevention is Blueground's legitimate interests in knowing who it contracts with and in protecting its properties, Guests and business against fraud. Where local law requires Blueground to identify or register occupants, the legal basis is compliance with that legal obligation.

Where the identity verification process involves biometric data, including data used to confirm that a Guest is a genuine, live individual and data used to match a Guest's facial image against their submitted identification document, the applicable legal basis is the Guest's explicit consent, which is obtained in the verification flow before the relevant biometric processing takes place. The Guest may withdraw such consent at any time, subject to applicable law and any consequences that may result where the processing is necessary for the provision of the relevant services. The results of identity verification and screening are reviewed by a member of Blueground's team before a booking is declined. Blueground does not take decisions that produce legal or similarly significant effects on a Guest by automated means alone.

For bookings made in the United States and Canada, Blueground may also obtain credit, rental history and background reports in connection with an application for property leasing services. Such checks may involve information obtained from credit reporting agencies, consumer reporting agencies, tenant screening providers, or other relevant third parties. To the extent Blueground obtains, uses, or discloses such information, Blueground shall do so solely in connection with evaluating the Guest's reservation or booking request, which constitutes a permissible purpose in accordance with applicable legislation.

3.3. Compliance with Legal and Regulatory Obligations

Blueground may process Guest Personal Data where necessary to comply with applicable laws, regulations, regulatory requirements, court orders, or requests from competent public or regulatory authorities. The applicable legal basis for this processing is compliance with Blueground's applicable legal or regulatory obligations.

3.4. Communication, Customer Support and Service Administration

Blueground processes Guest Personal Data in connection with communications and customer support to administer and support the relationship with the Guest and ensure the effective provision of the property leasing services. This includes responding to enquiries and requests, providing service-related information, addressing complaints, and communicating regarding the Agreement, the property, or other administrative matters. The applicable legal basis for such communications is the necessity of the

processing to enter into or perform the Agreement, or to take steps prior to entering into the Agreement.

Blueground may also process communication and support data for quality assurance, internal controls, complaint and dispute management, and the establishment, exercise, or defence of legal claims. Where permitted by applicable law, telephone calls with Guests may be recorded for these purposes. Where required, Guests will be informed in advance that a call may be recorded. The applicable legal basis for such communications shall be Blueground's legitimate interests in maintaining appropriate service standards, ensuring the quality and consistency of customer support, resolving disputes, and protecting its legal interests.

Blueground may contact Guests regarding the administration and management of the property, including general updates, building notices, access arrangements, maintenance, safety matters, and other administrative information. Such communications may be based on Blueground's legitimate interests in ensuring the efficient, transparent, and effective administration of the property and provision of the services. Communications will be limited to what is necessary and proportionate for these purposes.

3.5. Marketing Communications

Blueground may process Guest Personal Data to send marketing communications, including offers, newsletters, promotions, or information about Blueground's services or related services, where permitted by applicable law.

Where consent is required, such communications will only be sent where the Guest has provided the required consent. Where marketing communications may be sent without prior consent under applicable law, Blueground will comply with the applicable requirements and provide the Guest with an appropriate opportunity to opt out.

Where processing is based on consent, the Guest may withdraw such consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before the withdrawal. Guests may opt out of marketing communications at any time using the unsubscribe mechanism provided in the relevant communication or through Blueground's Privacy Request Center.

3.6. Accessibility and Accommodation Requests

Where a Guest voluntarily discloses information concerning a disability, health condition, or other special category of personal data in order to request specific accessibility features or accommodations, Blueground processes such data only to the extent necessary to assess and fulfil that request.

The applicable legal basis for this processing is the Guest's explicit consent. The Guest may withdraw consent at any time, without affecting the lawfulness of processing carried out before withdrawal, subject to the effect this may have on Blueground's ability to continue providing the requested services.

3.7. Bookings through Blueground's Partner Network

Where the Guest books a Partner Apartment, Blueground collects the Guest's booking and identification data through its website and verifies the Guest's identity as described in Section 3.2. Once verification is completed, Blueground shares with the partner (a) confirmation that the Guest's identity has been verified and that the Guest has been approved, and (b) the Guest's identification data. Blueground does not share with the partner any biometric data or other details of the verification process.

The partner uses this data to confirm the identity of the Guest who will occupy the Partner Apartment, to conclude and perform its arrangements with the Guest and to comply with any obligation under local law to identify or register occupants. The applicable legal basis for the disclosure is the necessity of the processing to perform the booking requested by the Guest, or to take steps at the Guest's request before the booking is concluded, and, where local law requires occupants to be identified or registered, compliance with that legal obligation. Where the partner is located outside the United Kingdom or the European Economic Area, the transfer is subject to the safeguards described in the Privacy Policy.

4. Data retention

The general criteria that Blueground applies to the retention of personal data are set out in section 6 of the Privacy Policy. The following specific periods apply to Guest Personal Data:

- **Identity verification and due diligence data:** Any copies of official documents collected in the course of verifying a Guest's identity (e.g. the Guest's passport or driver's licence) are retained for twelve (12) months from the date on which the Agreement is terminated or, where no Agreement is concluded, twelve (12) months from the date on which the application is withdrawn, rejected, or otherwise closed. This period reflects the time Blueground considers necessary to substantiate that a Guest's identity was verified in accordance with Blueground's onboarding process and to respond to post-tenancy disputes, suspected fraud, and legal or regulatory inquiries that may arise after a tenancy ends. It may be extended where a longer period is required by an applicable anti-fraud or other regulatory obligation, and is shortened where the law of the country in which the apartment is located requires a shorter period or does not permit copies to be kept. Any biometric data processed in connection with identity verification are deleted by Blueground and any third parties it uses for the provision of the identity verification services within one (1) month from the completion of the verification process.
- **Communication and support information:** Any records of Guest communications with Blueground, such as emails, written correspondence, chat or messaging records, and telephone communications, together with related metadata (such as the date, time, and duration of the communication), are retained in accordance with the criteria set out in section 6 and 10 of the Privacy Policy.
- **Data shared with partners:** Guest Personal Data shared with a partner under Section 3.7 is retained by that partner, as an independent controller, in accordance with the applicable law.

5. Disclosure of personal data

In order to achieve the purposes herein described, specific categories of Guest Personal Data may be disclosed by Blueground, where strictly necessary and subject to appropriate confidentiality and data protection obligations, to Blueground's third-party partners that support its services. These may include

providers of technology; data storage and security services; facility management providers engaged for the administration of the property; service providers engaged for the property's repair and maintenance; service providers involved with fraud detection and prevention; specialized third-party providers engaged to perform identity verification, screening and biometric authentication services as described in Section 3.2 above; and, where applicable, credit reporting agencies, consumer reporting agencies, tenant screening providers and other similar third parties engaged to conduct credit, rental history or background checks in connection with an application for property leasing services.

Where necessary for access to, or the safety and maintenance of, the property, limited Guest Personal Data may also be disclosed to the property's landlord and the building's management. Where the Guest books a Partner Apartment, the confirmation of the Guest's identity verification and the Guest's identification data are disclosed to the partner that provides it. Credit reporting agencies, consumer reporting agencies, identity verification providers and other recipients that determine their own purposes act as independent controllers. Other recipients, including Blueground group companies and advertising partners, are described in the respective sections of the Privacy Policy.

Blueground may also disclose personal data, if required to do so by law, or for the purposes of legal proceedings or a search warrant, or if, in its judgment, such disclosure is necessary to comply with Blueground's legal obligations. In this context, it may be necessary to transfer data to competent authorities and/or Blueground's legal advisors for the purposes of legal investigation, prevention, or action relating to suspected unlawful activities, fraud or breaches of the Agreement.

6. Further information

The rights available to Guests and how to exercise them, the general criteria applied to data retention, international transfers, information security, Blueground's use of artificial intelligence and the way changes to this Notice are notified are set out in the Privacy Policy. Guests may contact Blueground's Privacy Team at privacy@theblueground.com and Blueground's Data Protection Officer at dpo@theblueground.com.