

In accordance with the General Data Protection Regulation (hereinafter the "GDPR"), AURORA LERYON HOLDINGS SRL and its subsidiaries and affiliates, are acting as data controllers (hereinafter referred to as "LERYON") of personal data transmitted by candidates for rental accommodation, by tenants and/or prospects.

## 1. Objectives pursued by the processing

LERYON ensures that it only collects personal data of candidates, tenants and/or prospects that are strictly necessary for the purpose of the processing implemented.

LERYON may be required to collect and process personal data when renting out accommodation, to manage real estate portfolio or during the sale/ purchase process of a property and/or to carry out its commercial activity and for the purpose of:

- offer properties for rent (in particular for the analysis of the criteria of the properties sought by potential tenants and sending similar rental offers);
- manage the pre-documentation process and the conclusion of the lease contract (organization of visits; assessment of the solvency of candidates for rental, etc.);
- manage the life of the contract (in particular the follow-up of the payment of rents, common areas fees and security deposits or even the management of the occupation of the accommodation);
- terminate the lease contract (in particular the end of solidarity in the event of violence against a spouse or a child who usually resides with tenant and in the event of a termination following prior notice).

## 2. Legal bases for processing

Processing activities	Purposes	Legal basis
Proposal of properties for rent	Analysis of the criteria of the properties sought by potential tenants for sending rental proposals	Pre-contractual measures
Management of the pre-documentation process and conclusion of the lease contract	<ul style="list-style-type: none"> <li>• Organization of visits</li> <li>• Credit rating check</li> <li>• Conclusion of the lease and its annexes</li> </ul>	Pre-contractual measures

Contract life management	<ul style="list-style-type: none"> <li>• Follow-up of the payment of rents, common areas fees and security deposits</li> <li>• Housing occupancy management</li> <li>• Verification of insurance underwriting</li> <li>• Management of unpaid rent insurance</li> </ul>	Performance of the contract
	Data aggregation for the transmission of statistics to local rent observations governmental agencies	Legal obligation
	Transmission of personal information to the government, payment of council tax and/or social help received by the tenant(s)	Legal obligation
Termination of the lease contract	Termination of the lease	Performance of the contract

### 3. Personal data concerned

The following data is collected and processed by LERYON:

Steps	Data
Accommodation search	<ul style="list-style-type: none"> <li>• Personal identification</li> <li>• Contact details</li> <li>• Search criteria (location, rent, area etc.)</li> </ul>
Assessment of the solvency of the candidate and/or of the guarantor(s)	<ul style="list-style-type: none"> <li>• Valid proof of identity, bearing the photograph and signature of the holder</li> <li>• Proof of address for the candidate and for the guarantor</li> <li>• Certificate of professional activities</li> <li>• Resource certificate</li> </ul>
For the duration of the rental	<ul style="list-style-type: none"> <li>• Bank details</li> </ul>

	<ul style="list-style-type: none"> <li>• Email address</li> <li>• CAF or MSA number if receiving family allowances</li> <li>• Insurance certificate</li> <li>• Identity of the husband, wife or partner in the event of a request for co-ownership</li> </ul>
Request for end of solidarity	<ul style="list-style-type: none"> <li>• Copy of the protection order issued by the court and notified</li> <li>• Copy of criminal conviction decision rendered less than 6 months ago</li> </ul>
Termination and expiration of the lease	<ul style="list-style-type: none"> <li>• New tenant address</li> <li>• Bank details</li> </ul>

#### 4. Recipients and access to information

Only authorized persons within LERYON have access to the information and have it according to their role within LERYON.

Data may also be transmitted:

- to insurers for the guarantee of unpaid rents;
- to the tax authorities, in particular to document compliance with the resource ceilings of tenants in the context of intermediate rental investments or in the context of housing tax or any other tax due by the tenant
- to the company representing the owners if the owners decide to change the company
- to representatives of the owner if a legal provision so provides or if the persons concerned have consented to such transmission.
- other persons or organizations could be likely to receive communication of the data, provided that this communication complies with the principle of specific, explicit, and legitimate purpose and that the person concerned is able to oppose it (trustee, company having to carry out works, etc).

#### 5. Storage periods

Depending on each purpose, a data retention period will be set.

GDPR does not apply to anonymized data.

Purpose	Duration
---------	----------

Data collected prior to an application for rental	3 years from last contact
Data collected at the stage of assessing the solvency of candidates for rental	3 months when candidacy was not conclusive
Data relating to the successful rental candidate	Contractual duration and until the closing of the tenant's accounts
Data collected from the conclusion of the lease until its termination	Contractual duration and until the termination of the lease and return of the security deposit including any amount owed by the tenant

The data may be kept longer than the durations mentioned above if the data controller has a legal obligation to do so (for example, to meet accounting, social or tax obligations) or if he needs to constitute evidence in the event of litigation and within the limit of the applicable limitation/foreclosure period, in matters of discrimination for example.

## 6. Rights of data subjects

Data subjects have the following rights, which they exercise under the conditions provided by Article 13 of the GDPR:

- right of access to their file, as well as to all data concerning them in general;
- right to rectify data concerning them, if they are inaccurate;
- right to erasure data concerning them subject to the conditions for exercising this right pursuant to the provisions of Article 17 of the GDPR;
- right to restriction of processing. For example, when the person disputes the accuracy of their data, they can ask the organization to temporarily freeze the processing of their data, while the latter carries out the necessary checks concerning their request;
- right to portability under the conditions provided for in Article 20 of the GDPR;
- right to object to the processing of their data, subject to the conditions for exercising this right pursuant to the provisions of Article 21 of the GDPR. Thus, the right of opposition only applies when the processing is based on the legitimate interest pursued by the controller or a third party. However, it will not apply when the processing is based on a legal obligation or on the performance of the contract.

It should be noted that the choice of a legal basis for processing conditions the existence of certain rights. Thus, the transmission of statistics to local rent observatories meets a legal obligation. The tenant cannot therefore object in principle to the processing of his personal data, in accordance with the provisions of Article 21 of the GDPR.



To exercise the aforementioned rights, an email should be sent to the following email address:  
[data.privacy@leryon-holdings.com](mailto:data.privacy@leryon-holdings.com)

## **7. Security**

LERYON implements all the necessary precautions regarding the risks presented by the processing of data to preserve the security of personal data and, in particular at the time of their collection, during their transmission and their storage, in order to prevent the distortion, damage or access to it by unauthorized third parties.

## **8. Cookie Policy**

LERYON uses cookies on its site which are cookies strictly necessary for the operation of the site and for which the consent of the users is not necessary.

We inform you that third parties, such as Google, may also collect data from our sites through cookies, third-party modules and widgets. These third parties collect data directly from your browser and the processing of this data is subject to their own personal data privacy.

## **9. Contact**

For any questions relating to this policy, you can contact LERYON at the following email address:  
[data.privacy@leryon-holdings.com](mailto:data.privacy@leryon-holdings.com)