

Tulu Privacy Policy

Last Updated: December 9, 2021

This privacy policy (“**Privacy Policy**”) governs how we, Tulu (“**Tulu**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data that we collect or receive from or about you (“**User**”, “**you**”) such as in the following use cases:

- (i) When you browse or visit our website, www.tulu.io (“**Website**”)
- (ii) When you make use of, or interact with, our Website
 - a. When you contact us (e.g. customer support, contact us request, etc.)
- (iii) When you download, make use of, or interact with, our mobile software application (“**App**”).
 - a. When you sign up for an account and when you log in
 - b. When you Purchase and/or rent a product or a service (“**Services**”)
 - c. When you make use of the App for its intended use
 - d. When you contact us (e.g. customer support, contact us request, chat)
- (iv) When you interact with us on our social media profiles (e.g. Facebook, Instagram, LinkedIn)
- (v) When we use the Personal Data of our partners (e.g. contact details)

Please read this Privacy Policy carefully, so you can understand our practices and your rights in relation to personal data. “**Personal Data**” or “**Personal Information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being and any information deemed as Personally Identifiable Information by privacy laws.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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This Privacy Policy may be updated from time to time and, therefore, we ask you to check back periodically for the latest version of the Privacy Policy. If we implement significant changes to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Specific Personal Data we collect	Why is the Personal Data collected and for what purposes?	Legal basis	Third parties with whom we share your Information	Retention period	Consequences of not providing the Information
<i>When you browse or visit our website</i>					
<p>Cookies</p> <p>For more information, please read our cookies policy</p>	<p>Marketing analytics, statistics</p>	<ul style="list-style-type: none"> • Legitimate interest: for essential cookies • Cookies consent: non-essential cookies 	<ul style="list-style-type: none"> • WordPress (host and build websites) 	<p>For more information, please read our cookies policy LINK</p>	<ul style="list-style-type: none"> • Certain non-essential Website features may not be available • Read more about the purposes of each cookie here LINK
<i>When you make use of, or interact with our Website</i>					
<i>When you contact us</i>					
<ul style="list-style-type: none"> • First and last name • Email address • Phone number • City • Property (e.g., Residential, Student housing, Office, Hospitality) • Role (Tenant, Property manager, Owner, Other) • Message 	<ul style="list-style-type: none"> • To answer your questions and requests • To provide you customer service and support • To schedule a demo • To set up the App and the demo 	<ul style="list-style-type: none"> • Legitimate interest (to respond to your question or request) • Performance of a contract, for example, if you are a customer and decide to contact us via the Website. 	<ul style="list-style-type: none"> • Wix (web hosting) • Intercom (online support) • Active Campaign (marketing automation system) • surveylegend (online survey tool) • <i>WordPress (host and build websites)</i> • Amazon Web Services (AWS) • Salesforce(CRM) 	<p>Depending on the context: until you send a valid deletion request or we proactively delete the data</p>	<ul style="list-style-type: none"> • Cannot contact us and we cannot assist/help you • Cannot set up the mode of use of the demo
<i>When you download, make use of, or interact with our App</i>					
<i>When you sign up for an account and when you log in</i>					
<ul style="list-style-type: none"> • First and last name • Email address • Phone number • Address or building details • Language • Apartment Number 	<ul style="list-style-type: none"> • To be able to create an account • To be able to log in • To provide you the Services • For authentication 	<ul style="list-style-type: none"> • Performance of a contract 	<ul style="list-style-type: none"> • Amazon Web Services (AWS) • Wix (web hosting) • OneSignal (push notification tool) 	<p>Depending on the context: until you send a valid deletion request or we proactively delete the data</p>	<ul style="list-style-type: none"> • Cannot create an account • Cannot log in • Cannot use the Services

	<ul style="list-style-type: none"> To send you marketing communications 	<ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> service) Twilio (communication tool service) Firebase (authentication tool service) Active Campaign (marketing automation system) BigQuery (analytic tool) ZOHO (CRM tool) Data Studio (visualization tool) Salesforce (CRM) 		<ul style="list-style-type: none"> Cannot send you marketing communications
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When you purchase and/or rent a product or service

<ul style="list-style-type: none"> Purchase and/or rent history The time and duration you use the Services 	<ul style="list-style-type: none"> To process your requests To perform or execute and track your rental request To improve the services and support we provide you 	<ul style="list-style-type: none"> Performance of a contract Legitimate interest: communicate with you 	<ul style="list-style-type: none"> Amazon Web Services (AWS) Wix (web hosting) OneSignal (push notification service) Twilio (communication tool service) Amazon S3 (web hosting) BigQuery (analytic tool) Green Invoice (invoice system) ZOHO (CRM) Data Studio 	Depending on the context: until you send a valid deletion request or we proactively delete the data	<ul style="list-style-type: none"> Cannot use the Services Cannot provide you with the Services
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			(visualization tool) <ul style="list-style-type: none"> • Salesforce (CRM) 		
<ul style="list-style-type: none"> • Payment information (e.g. credit card details) 	<ul style="list-style-type: none"> • To provide you the Services 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest: process payments 	Stripe (online payment)	Depending on the context: until you send a valid deletion request or we proactively delete the data	Cannot use the Services
<ul style="list-style-type: none"> • CCTV – collected only in Tulu's premises in the buildings where Services are being provided (the "Space") • Image of a person located in the Space • Date and time of the recording in the Space 	To prevent or detect criminal offences related to the protection of the Space and equipment and the protection of vital human interests	Legitimate interests: protect the Space, its equipment and the safety of the staff and tenants.	<ul style="list-style-type: none"> • Xiaomi (cloud storage) • Amazon cloudcam 	Data retrieved shall be retained for not more than 30 days, except when a security incident has occurred, then the data shall be retained until the completion of the investigation.	Cannot prevent or detect criminal offences in the Space
<i>When you contact us (e.g. customer support, contact us request, chat)</i>					
<ul style="list-style-type: none"> • History • First and last name • Email address • Phone number • Address 	<ul style="list-style-type: none"> • To provide you customer service and support • To answer your questions and requests 	<ul style="list-style-type: none"> • Performance of a contract, for example, if you are a customer. • Legitimate interest (to respond to your question or request) 	<ul style="list-style-type: none"> • Amazon Web Services (AWS) • Wix (web hosting) • Active Campaign (marketing automation system) • BigQuery (analytic tool) • ZOHO (CRM) • Intercom (online support) • Data Studio (visualization tool) 	Depending on the context: until you send a valid deletion request or we proactively delete the data	Cannot contact you and we cannot assist or help you
	<ul style="list-style-type: none"> • To send you marketing communications 	Legitimate interests: we have a legitimate interest in sending, and you have shown legitimate interest in receiving, marketing content			
<i>When you interact with us on our social media profiles (e.g. Facebook, Instagram, LinkedIn, TikTok)</i>					

<ul style="list-style-type: none"> ● Contact history ● First and last name ● Email address ● Phone number ● Address 	<ul style="list-style-type: none"> ● To provide you customer service and support ● To answer your questions and requests 	<ul style="list-style-type: none"> ● Performance of a contract, for example, if you are a customer. ● Legitimate interest (to respond to your question or request) 	<ul style="list-style-type: none"> ● Amazon Web Services (AWS) ● Wix (web hosting) ● Intercom (online support) ● Salesforce (CRM) 	Depending on the context: until you send a valid deletion request or we proactively delete the data	Cannot contact us and we cannot assist or help you
<i>When we use the Personal Data of our partners (e.g. contact details)</i>					
<ul style="list-style-type: none"> ● First and last name ● Email address ● Phone number ● Company name ● Job title ● Billing information ● Any other data said partner choose to share with us 	<ul style="list-style-type: none"> ● To communicate with our partners ● To perform the applicable agreements ● To send contract related communications 	<ul style="list-style-type: none"> ● Performance of a contract (to which the data subject is party) or in order to take steps at the request of the data subject prior to entering into a contract ● Legitimate interest (send contract related communication) 	<ul style="list-style-type: none"> ● Amazon Web Services (AWS) ● Wix (web hosting) ● Active Campaign (marketing automation system) ● BigQuery (analytic tool) ● ZOHO (CRM) ● Intercom (online support) ● Data Studio (visualization tool) 	Depending on the context: until you send a valid deletion request or until we do not longer need the data	<ul style="list-style-type: none"> ● Cannot perform the applicable agreement ● Cannot communicate with our partners ● Cannot send contract related communications

Finally, please note that some of the abovementioned Personal Data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your Personal Data and further use it for internal and external purposes, including, without limitation, to improve the services and for research purposes. “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

2. HOW WE PROTECT AND STORE YOUR PERSONAL DATA

- Security. We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the

information will not be exposed as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

- o Retention of your Personal Data. In addition to the retention periods mentioned above, please note that in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings. Regarding retention of cookies, you can read more in our cookie policy [LINK](#)

3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your Personal Data as follows:

- o With our business partners with whom we jointly offer products or services. We may also share Personal Data with our affiliated companies
- o To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- o If, in the future, we sell or transfer some or all of our business or assets to a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your Personal Data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company;
- o Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional Services or functionality); and/or
- o Where we receive requests for information from law enforcement or regulators, in which case we carefully validate these requests before any Personal Information is disclosed.

4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL INFORMATION

- o Storage: We store the Personal Data with the following storing companies: Wix, AWS RDS, ZOHO, Active Campaign, Intercom and Amazon S3.
- o Internal transfers: Internal transfers within Tulu group will be covered by an appropriate agreement which contractually obliges each member of the Tulu group to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to.
- o External transfers: Where we transfer your Personal Data outside of Tulu group (for example to third parties who provide us with our products or services), we will generally obtain contractual commitments to protect your Personal Data.

When Tulu engages in such transfers of personal information (internal and external), it relies on (i) Adequacy Decisions as adopted by European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR) (for example, when we access from Israel), or (ii) Standard Contractual Clauses issued by the European Commission. Tulu also continually monitors the circumstances surrounding such transfers in order to ensure that these maintain, in practice, a level of protection that is essentially equivalent to the one guaranteed by the GDPR.

5. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT.

Rights: The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- o You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- o You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
- o You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims;
- o You have the right to object, to or to request restriction, of the processing;
- o You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- o You have the right to object to profiling;
- o You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- o You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- o You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

You can exercise your rights by contacting us at info@tulu.io. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

6. USE BY CHILDREN

We do not offer our products or Services for use by children and, therefore, we do not knowingly collect Personal Data from, and/or about children under the age of eighteen (18).

7. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. LOG FILES

We use log files. We use such information to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

9. GOOGLE ANALYTICS

The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with Personal Information we collect. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

10. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at info@tulu.io.