

CORPORATE | LIVING

FURNISHED ACCOMMODATIONS WORLDWIDE | EST. 1993

Corporate Living Privacy Policy

Effective Date: January 1, 2019

Overview

Corporate Living practices full transparency in all facets of its business operations, and personal information collection, transmission, processing, and storage is no exception. When it comes to your personal information, there should be no surprises. That is why we have outlined what personal information we collect, what we do with it, and your choices and rights therein.

How Does This Privacy Policy Apply?

This Privacy Policy describes what we do with personal information that we collect (i.e., where we are a controller), such as your name and work address, information you submit unsolicited, such as a temporary address and phone number to our customer support, and information relayed to us from a contracted third party.

Personal Information

We collect/receive various personal information in order to effectively operate/manage our business. When Corporate Living receives personal data from EU individuals/organizations directly, we act as a Data Controller. When personal data is received via a third party, we act a Data Processor. Information we control and process includes but is not limited to the following:

- Information provided to secure leases: first name, last name, passport number, credit card information, etc.
- Information shard via Guest Service submissions, marketing inquiries, and FAQ
- Information transmitted from our partners to support a standard temporary housing assignment

How We Collect Personal Information

We obtain personal information from a variety sources, in two main ways:

- 1) Users provide information directly
 - a. For instance, we often ask you to provide your name and email address to support efficient communications to help secure an apartment lease. You might also provide us with information in other ways, including by responding to surveys, submitting a form, or contacting us via phone. Occasionally, we require you to provide us with information for contractual or legal reasons. For example, we may ask you for your credit card information to keep on file for hotel reservations, a necessary step to secure a room. We will always inform you when information is required, and the consequences of failing to provide it. If you do not provide personal information when requested, you may not be able to use our services if that information is necessary to provide you with the service or if we are legally required to collect it.
- 2) We receive information from third parties (such as a Relocation Management Company)
 - a. Receipt is typically processed via email or phone call. In situations where personal information is provided indirectly, we may request additional details to support efficient provision of our services.

Personal Information Obtained from Third Parties

In Corporate Living's normal course of business, personal data is often transmitted to us by mobility-industry-companies looking to utilize our services. These companies include but are not limited to: relocation management companies, corporate housing providers, and sourcing platforms. Be sure to review the Privacy Policy and Terms of Service of any company with whom you share personal information.

How We Use Your Personal Information

We use the personal information we obtain about you for a number of reasons, including but not limited to:

- 1) Provision of the Services: acquire/complete leasing documentation, process payments, and respond to your inquiries.
- 2) Communicate with you: this includes sending emails about your services/transactions, as well as service-related announcements/updates.
- 3) Transmission to Properties: when required, personal data is shared with vetted third parties for the purposes of, including but not limited to: establishing residency and processing background checks.
- 4) Customization of Services: for example, we use your temporary worksite location to determine potential properties that are an appropriate/reasonable distance from your offices.

- 5) **Improvement of Services:** we use historical examples to highlight potential issue patterns and develop efficient, forward looking strategies for improvement. We consistently use previous performance to develop new products and services and help manage our communications.
- 6) **Trusted Third Party Relationships:** we vet all our partners and have stringent, comprehensive total duty of care requirements to help manage our vendors/processes.
- 7) **Enforcement and Protection:** we adhere to and strictly enforce our Privacy Policies to protect our and others' interests, rights, and property.
- 8) **Legal Compliance:** we always comply with applicable legal requirements, such as tax and other government regulations and industry standards, contracts, and law enforcement requests.

We process your personal information for the above purposes when:

- 1) **Consent Is Obtained:** you have consented to the use of your personal information. Once you have consented, you may change your mind at any time.
- 2) **Performance of Contractual Obligations:** we often require personal information to provide services and products requested, or to respond to inquiries. In other words, so we can perform our contract with you or take steps at your request before entering into one. For example, we need your name to sign a binding lease.
- 3) **Legal Obligations:** we have a legal obligation to use your personal information, such as to comply with applicable tax and other government regulations or to comply with a court order or binding law enforcement request.
- 4) **Legitimate Interests:** we have a legitimate interest in using your personal information. More specifically, we have a legitimate interest in the following cases:
 - a. To operate the Corporate Living business and provide you with tailored communications to develop/promote our business and provide the services promised/contracted for.
 - b. To analyze and improve the safety and security of our services - we do this as it is necessary to pursue our legitimate interests in ensuring Corporate Living is secure, such as by implementing and enhancing security measures and protections and protecting against fraud, spam, and abuse.
 - c. To provide and improve our services, including any personalized services - we do this as it is necessary to pursue our legitimate interests of providing an innovative and tailored offering to our Users on a sustained basis.
 - d. **Others' Legitimate Interests:** where necessary for the purposes of a third party's legitimate interests, such as our partners who have a legitimate interest in delivering appropriate administrative documentation.

Sharing Your Personal Information

We share personal information in several ways, including but not limited to:

- 1) **Business Partners:** we may share personal information with business partners. For example, we may share your personal information with a contracted property management company for the purposes of securing a lease, but only when you have been informed or would otherwise expect such sharing.

- 2) **Service Providers:** we share personal information with our service providers that perform services on our behalf. For example, we may use third parties to help us provide customer support, tour properties, send marketing, or assist with data storage.
- 3) **Process Payments:** we may transmit your personal information to our payment processor.
- 4) **Following the Law or Protecting Rights and Interests:** we disclose your personal information if we determine that such disclosure is reasonably necessary to comply with the law, protect our or others' rights, property or interests, or prevent fraud or abuse. In particular, we may disclose your personal information in response to lawful requests by public authorities, such as to meet national security or law enforcement requirements.
- 5) **Business Transfers:** in the event we are involved in a reorganization, merger, acquisition, or sale of some or all of our assets, your personal information may be transferred as part of that deal.

Cookies Policy

Corporate Living uses cookies to administer its website (www.corporateliving.com), analyze trends, and to track users' movements around the website.

When you first access Corporate Living's website, you receive a message advising you that cookies are in use. By clicking "accept", closing the message, or continuing to browse the website, you signify that you understand and agree to the use of these technologies, as described in this Cookies Policy.

Acceptance of cookies is not required and consent can be withdrawn at any time (see [How to Control Cookies](#), below). You can change your browser settings to refuse or restrict cookies, and you may delete them after they have been placed on your device at any time. If you do not accept or delete Corporate Living's cookies, some areas of our website that you access may take more time to work, or may not function properly.

Cookies

Cookies are small files containing a string of characters which we store on your computer or mobile device when you visit the website. When you visit the website again, the cookies allow us to recognize your browser. Cookies may store your preferences and other information but cannot read data off your hard disk or read cookie files created by other sites.

The Cookies We Use

We use cookies for a variety of reasons. The aggregate information collected permits us to analyze traffic patterns and target the interests of our users. This helps us provide you with a better experience by improving the content and making our website easier to use.

We use the following categories of cookies:

Performance and Functionality Cookies: These are used to recognize you when you return to our Site. This enables us to personalize our content for you and remember your preferences (for example, your choice of language or region), but are non-essential to the performance of the Site.

Analytical or Customization Cookies: These cookies collect information about how users access and move through the Site. We use this information in either aggregate form to help us to improve the way our website works, or to personalize our website to your interests.

Controlling Cookies

How to Control Cookies

When you first access the website, you receive a message advising you that cookies and similar

technologies are in use. By clicking "accept", closing the message, or continuing to browse the website, you signify that you understand and agree to the use of these technologies, as described in this Cookies Policy.

You do not have to accept cookies and consent can be withdrawn at any time, although you may not be able to use certain features on the website. You can do this by activating the setting on your browser that allows you to refuse the setting of all or some cookies.

Rights and Choices

You may have the right to access, update, change, or delete personal information.

You can access, update, change, or delete personal information directly by contacting us at privacy@corporateliving.com to request the desired changes.

You can also elect not to receive any marketing communications by following the unsubscribe instructions in such communications.

Please note that erasure of your personal Information from our systems may not occur immediately. We will retain personal Information in order to comply with the law, protect our and others' rights, resolve disputes, or enforce our legal terms or policies, to the extent permitted under applicable law. You have the right to withdraw consent at any time. When you do so, this will not affect the lawfulness of the processing before your consent withdrawal.

Personal Information Protection

Corporate Living employs a designated security team to maintain the integrity and safety of all controlled, transmitted, processed, and stored data. Physical, technological, and operational protections are employed to appropriately protect against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the personal information in our possession. We employ security measures such as using firewalls, building redundancies throughout our network (so that if one drive goes down, another can cover for it), and testing for and protecting against network vulnerabilities on a consistent basis.

Personal Information Retention

We retain personal information for as long as they are needed to provide our services and retain personal information for as long as necessary to achieve the purposes described in this Privacy Policy. For example, to comply with our legal obligations, to protect us in the event of disputes, to enforce our agreements, and to protect our and others' interests, additional information retention may be required.

The precise periods during which personal information is retained may vary depending on the nature of the information. Factors we consider in determining these periods include the minimum required retention period prescribed by law or recommended as best practice, the period during which a claim can be made with respect to an agreement or other matter, whether the personal information has been aggregated or pseudonymized, and other relevant criteria. For example, the period we keep your work address may be connected to how long your requirement of services is active, while the period for which we keep a support message may be based on how long has passed since the last submission in the thread.

As business with Corporate Living may recur after becoming inactive, we don't immediately delete your personal information when your billing/service period ends. Instead, we keep your personal information for a reasonable period of time so it will be accessible should we re-contract.

You may specifically request erasure of your personal information by contacting us at privacy@corporateliving.com and we will delete all personal information (unless we need to retain it for the purposes set out in this Privacy Policy).

Privacy Shield

Corporate Living has committed its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. We are committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, please visit the U.S. Department of Commerce's Privacy Shield List at <https://www.privacyshield.gov>.

Corporate Living is responsible for the processing of personal data it receives, under each Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Corporate Living complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, Corporate Living is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have a question or complaint you believe to be within the scope of the Privacy Shield principles, please contact us first at privacy@corporateliving.com.

With regard to unresolved privacy issues, you may be entitled to a binding arbitration under the Privacy Shield Principles. For purposes of enforcing compliance with the Privacy Shield, Corporate Living is subject to the investigatory and enforcement authority of the U.S. Federal Trade Commission.

Privacy Policy Updates

Our Privacy Policy will be updated from time to time to reflect changes in technology, law, our business operations, or for any other reason we determine is necessary or appropriate. When changes are made, we will update the “Effective Date” at the top of the Privacy Policy and post it on our site. If we make material changes to it or the ways we process personal information, we will notify you (by, for example, prominently posting a notice of the changes on our sites before they take effect or directly sending you a notification).

We encourage you to check back periodically to review this Privacy Policy for any changes since your last visit. This will help ensure you better understand your relationship with us, including the ways we process your personal information.

Contact Us

If you have questions, comments, or complaints about this Privacy Policy or our privacy practices, or if you would like to exercise your rights and choices, please email us at privacy@corporateliving.com, or write to us at the address below:

Corporate Living

Attention: Legal

3700 Park East Drive, STE 200

Cleveland, OH 44122