

This privacy policy must be read in conjunction with our Terms of Use

1. Who are we?

STUDENT CONNECTS

2. What data do we collect about you?

2.1.1 Data provided through direct interactions

Registration and other account information

When you register to use our Services we may collect the following information about you:

- if you register through your mobile phone: mobile number;
- if you register using your Google account: first name, last name and email address and the URL to your Google profile picture;

Depending on the choices you make during the log-in to our Services or during the process of engaging our Services, you may opt to give the following additional personal data:

- your name;
- e-mail address;
- mobile number;
- your payment details, in case you want to use our paid services, which depending on the payment method used, include:
- your credit card details (card holder name, card expiry date, credit card type and the last four digits of your credit card number);
- your mobile number;
- your email address.

Validation of your STUDENT CONNECTS account

We validate the accounts of STUDENT CONNECTS users by using SMS or email verification to ensure that each account is associated with a real and unique user. This validation process is initiated once you proceed to posting your first ad listing on our Services. In order to validate your STUDENT CONNECTS account before posting your ad listing we will send you an SMS on a valid mobile number provided by you or via email. This process is entirely free of charge.

Once you have validated your STUDENT CONNECTS account, it will remain associated with the mobile number used for the SMS verification. If you wish to change the mobile number associated with your STUDENT CONNECTS account, you will need to contact our Customer Support team.

Communication through the chat function on our Services

When you use our chat function to communicate with other users, we collect and process the content and information that you choose to provide to other users through this function.

Taking part in our user surveys

We will occasionally provide you with our user surveys in order to measure your overall

satisfaction with the quality of our Services. Please be aware that the information you give us in relation to our survey questions may occasionally contain personal data as voluntarily provided by you in your answers.

2.1.2 Data we collect automatically when you use our Services

When you use our Services, we automatically collect the following information about you:

Device Information

- We collect device-specific information such as operating system version, unique identifiers. For example, the name of the mobile network that you are using, your IP address, your device language settings, device brand and type, device operating system and version, browser type and version, and device specific software information such as fonts, system and browser timezone, available video and audio formats. If you are logged in, we associate the device identifiers with your STUDENT CONNECTS account.

Location information

- Depending on your device permissions, if you post an item on our Services, we automatically collect and process information about your actual location. We use various technologies to determine location, including IP address, GPS, Wi-Fi access points and mobile towers. Your location data allows you to see user items near you and helps you in posting items within your location. In case we need your location data we will first show you a pop-up which will ask you to choose to allow or not to allow us to access your location data, on your mobile device. If you do not allow us to have access to your location data, you will still be able to use our Services but with limited functionality. If you do allow us to access your location data you can always change this later by going to the settings on our website or mobile app and disable the permissions related to location sharing. To find out more on the purposes of using your location data and the way such data is processed, please refer to Section 4.2 (ii) of this Privacy Statement.

Client and Log data

- Technical details, including the Internet Protocol (IP) address of your device, time zone and operating system. We will also store your login information (registration date, date of last password change, date of last successful login), type and version of your browser.

Clickstream data

- We collect information about your activity on our Services which includes the sites from which you accessed our Services, date and time stamp of each visit, searches you have performed, ad listings or advertisement banners you clicked, your interaction with such advertisements or ad listings, duration of your visit and the order in which you visit the content on our Services.

Cookies and Similar Technologies

- We may place small text files called 'cookies' on your device when you visit our website. Cookies and similar technologies are used to enhance your experience on websites by remembering your preferences etc.

2.1.3 Data from third parties or publicly available sources

We receive personal data about you from various third parties and public sources which we may combine or connect to the personal data we collect from you through our Services. In particular, this includes the following information:

1. if you register using your Google account: we receive the email address connected to your Google account (to create your STUDENT CONNECTS account and to send you system notifications and marketing messages), your Google ID and your full name (used as your user name when you are using our Services) and the URL to your profile picture (to create the profile picture of your STUDENT CONNECTS account)
2. if you register using your Facebook account: we receive the email address connected to your Facebook account (to create your STUDENT CONNECTS account and to send you system notifications and marketing messages) and your public profile information including your Facebook ID, first name and last name (used as your user name when you are using our Services) and the URL to your Facebook profile picture (to create your STUDENT CONNECTS account profile picture);
3. Certain technical and usage information from analytics providers, such as Google Analytics 360, for statistical purposes and to analyze the usage of our Services, to improve our Services.
4. if you choose to store your payment card details with us, we receive the following details related to your card from our payment partners, such as Adyen: first and last name, card expiry date, the last four digits of the card number.;

3. Why do we process your personal information?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and we believe that our legitimate interests are not overridden by your or other data subjects' interests or fundamental rights and freedoms, for example to improve our Services and to make our Services safe and secure.
- Where we need to comply with a legal or regulatory obligation.

In certain circumstances, we may also process your personal data based on your consent. If we do this, we will let you know the purpose and the category of personal data to be processed at the time we seek your consent.

We have set out below a description of the reasons for which we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

3.1 For providing access and delivering Services

If you log in using your mobile device we use your mobile number to identify you as a user and provide access to our Services.

If you log in using your Facebook account or your Google account or your Apple ID, we use your first name and last name and your email address of such account, as well as the URL to your

profile picture (except for Apple ID) to identify you as a user of our Services and to provide you access to our Services. The above log-in data is also used by us to deliver our Services to you in accordance with our Terms of Use

We use third party payment service providers to process any payment you make for our Services. Depending on the method of payment, you may be requested to provide us with your payment and credit card details which we will then provide to the payment service provider in order to process your payment. We do not store any credit card code verification values and merely forward such values and your credit card number in an encrypted manner for the purpose of processing your payment by our payment service provider.

We process the above information for adequate performance of our contract with you.

3.2 For improving your experience of our Services

1. We use clickstream data to:

- offer you tailored content, such as giving you more relevant search results when using our Services.
- to determine how much time you spend on our Services and in what manner you navigate through our Services in order to understand your interests and to improve our Services based on this data. For example, we may provide you with suggestions on content that you can visit based on the contents you have clicked.
- If you choose to provide us with your location data, we use your location data for the following purposes:
 - to compile anonymous and aggregated information about the characteristics and behaviour of STUDENT CONNECTS users, including for the purposes of business analysis, segmentation and development of anonymous profiles.
- to enhance the performance of our Services and to personalise the content we direct towards you. For example - with the help of location data we display ad listings which are in your vicinity to improve your buying experience. For this purpose, the service Google Maps is integrated into our Services. Google Maps is provided by us and Google acting as an independent responsible party. This means that both Google and we are responsible for the processing of your location data in the context of Google Maps. In any case, we will not process your location data for any other purposes but those explained in this Privacy Statement. However, Google might process such location data for their own purposes as explained in the Google Privacy Policy. Your use of Google Maps through our Services is subject to Google Maps
- With the help of your account contact information which includes your email and your mobile number, we map the different devices (such as desktop, mobile, tablets) used by you to access our Services. This allows us to associate your activity on our Services across devices and helps us in providing you a seamless experience no matter which device you use.
- We use the images you upload, the descriptions and prices you provide in your ad listings to train models to personalize search results in relation to ad ranking and user interest, to improve the identification and presentation of ad items, to improve the search function and to increase the likelihood of a successful sale. This helps us to improve our Services and to provide you with a better user experience.
- To show and recommend ad listings on our Services that may be of interest to you, we make use of that use information related to your browsing behaviour, items you bought, clickstream data, your user ID and your location data if you have given us permission to use this. We use this form

of automated decision-making on the basis of our legitimate interest in improving our Services and provide a better user experience by offering you more relevant ad listings.

- We access and analyze your chat messages with other users conducted through the chat function on our Services for product enhancement and to provide you with a better user experience (e.g. to identify sold items and to provide you with active ad listings only). Therefore we develop and train machine learning models and algorithms to automatically analyze your chat content. To build and train our machine learning models our machine learning specialists may review exemplary chat content manually. In these circumstances highly restrictive access rights apply to selected machine learning specialists analyzing the chat content. During this analysis process, we are de-identifying chat content as much as possible by applying a scanning filter to detect and hide personal data such as names, phone numbers, e-mail addresses. However, there may still be cases beyond our control in which the chat content may show certain personal data that you have chosen to provide.
- We may use your email address to provide you with a survey to rate our customer support service.

We process the above information for adequate performance of our contract with you and on the basis of our legitimate interest to improve your experience of our Services.

3.3 To provide you safe and secure Services

1. We use your mobile number, log data and unique device identifiers to administer and protect our Services (including troubleshooting, data analysis, testing, fraud prevention, system maintenance, support, reporting and hosting of data).
2. We access and analyze your chat messages with other users conducted through the chat function on our Services for customer satisfaction, safety and for fraud prevention purposes (e.g. to block spam or abusive messages that may have been sent to you by other users). Therefore we develop and train machine learning models and algorithms helping us to automatically detect and prevent inappropriate and fraudulent user behaviour. During the analysis and training process, we are de-identifying chat content as much as possible by anonymizing the unique identification values assigned to users. However, there may still be cases beyond our control in which the chat content may show certain personal data that you have chosen to provide. Only in limited cases and circumstances our customer safety and security specialists review chat content manually, for example if we have strong indications leading to the urgent suspicion of fraudulent activities. In these circumstances highly restrictive access rights apply to selected customer safety and security specialists analyzing the chat content.
3. To prevent and detect fraud on our Services, we make use of algorithms that recognize suspicious or fraudulent user behaviour based on certain information such as user activity and posted content, which may lead to us banning certain user accounts. Automated banning happens when there is a very high degree of certainty that an account or action is fraudulent. Otherwise human review takes place by selected customer safety and security specialists on the basis of highly restrictive access rights. We use this form of automated decision-making on the basis of our legitimate interest to detect and prevent fraud and to keep our Services safe and secure for our users. If you think that your account was wrongfully banned, you can contact Customer Support in which case our team will review the decision to ban your account.
4. We collect certain information from and in relation to the electronic device from which you are accessing our Services on the basis of our legitimate interest in preventing fraud on our Services. The information we collect includes your user ID (depending on whether you are logged in), STUDENT CONNECTS country domain, IP address, device language settings, device brand and type, device operating system and version, browser type and version, and device specific software information such as fonts, system and browser timezone, available video and audio formats. The device related information is used to determine whether the same

device is being used when users interact with our Services. We associate such information with a user fraud score on the basis of which we may ban certain users. If you think that your account was wrongfully banned, you can contact our Customer Support in which case our team will review the decision to ban your account.

We process the above information for adequate performance of our contract with you and on the basis of our legitimate interest in preventing fraud and in improving the overall quality and effectiveness of our Services.

3.4 To promote and offer you Services that may be of your interest

1. We use your email address and mobile number (by SMS) to make suggestions and recommendations to you about our Services that may be of interest to you.
2. To send you communications via email to make suggestions and recommendations to you about ad listings or about our Services, we make use of algorithms that use information based on your clickstream data. We will always provide you with the possibility to opt-out of such communications by including a link to unsubscribe. We use this form of automated decision-making on the basis of our legitimate interest in improving our Services, increase the number of transactions on our Services and provide a better user experience by offering you more relevant ad listings.
3. We use clickstream data to monitor and report the effectiveness of the campaign delivery to our business partners and for internal business analysis.

We process the above information on the basis of our legitimate interest in undertaking marketing activities to offer you Services that may be of your interest. Specifically, you may receive certain marketing communications from us:

- by any preferred means of communication, if you have requested such information from us;
- by email, regarding similar products and services, if you already use our Services or acquired some of our products;
- by phone or email, if you provided us with your details when you entered a competition; or
- by phone or email, if you registered for a promotion.

You can ask us to stop sending you such marketing communication at any time by clicking on the opt-out link in the email sent to you or by directly changing your notification settings in your account.

In other cases than those mentioned above, we will only use your email and mobile number to send you direct marketing communications (by way of email, push notifications, SMS or phone calls) if you have given us your consent to do so by ticking the relevant box when registering on our Services. You may always change your mind and withdraw your consent in the notification settings of your STUDENT CONNECTS account.

In case you have problems changing your notification settings please contact us using our Customer Support team.

4. How will we inform you about changes in our privacy statement?

We may amend and update this privacy statement from time to time. We will notify you of material changes to this privacy statement as appropriate under the circumstances and as required by applicable laws, e.g. by placing a prominent notice within our Services or by sending you a message via our Services or by sending you an email. If you do not agree with the way we are processing your personal data and the choices we are providing to you, you may close your account at any time by going into your account settings and select delete account.

5. Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below, please go to your account/privacy settings or contact our Information Officer.

- **Right to request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to request correction** of any of the data we have about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Right to request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note that for certain purposes we may be legally obligated to retain your data.
- **Right to object** to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. You can exercise your right to object in the following ways, depending on the processing activity you would like us to cease:
 - for marketing emails, click on the unsubscribe link in our emails to change your notification settings in your account;
 - for marketing SMS, push notifications or phone calls, change your notification settings in your account to opt-out;
 - for any objection to processing your data in general, you can contact our Information Officer.
- **Right to withdraw your consent** to the processing of your personal data at any time. This does not affect the legality of any processing we have already carried out based on the consent given previously.

Time limit to respond: We try to respond to all legitimate requests within one month. Occasionally it may take us longer than if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

However, before you make a complaint to the Information Regulator, we would appreciate the chance to deal with your concerns in the first instance, please reach out to our Information Officer.

6. Communication

We will communicate with you by email, SMS or in app notification in connection with our Services to validate your account with us, to inform you in case your ad listing has become live/expired and for other transactional messages in relation to our Services. As it is imperative for us to provide you with such transactional messages you may not be able to opt-out of such messages.

8. International transfers

We will not transfer any personal information across a country border without your prior written consent.

9. Where do we store your data and for how long?

The data we collect about you will be stored and processed inside as well as outside the EEA in secure servers in order to provide the best possible user experience. For example for a fast website or mobile application build up.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, tax and accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We keep the personal data related to your account for as long as you are a registered user or until you delete your account, in which case we will ensure that your data is deleted without undue delay and as soon as technically feasible.

Once your account has been closed we may retain certain data to the extent that this is necessary (i) to fulfill our legal obligations such as for tax, accounting and auditing purposes or (ii) to settle a legal claim or dispute or to comply with an authority request e.g. in relation to law enforcement. We will keep only the data that are relevant for such purposes and delete such data once the applicable retention or statutory limitation periods have expired or once the respective legal purpose has been fulfilled.

Personal data related to cookies are stored for the period corresponding to the life cycle of the cookie type, or until deleted by you.

In case you have any queries in relation to the retention period of your data please contact us using our Information Officer.

10. Technical and organisational measures and processing security

All the information we receive about you are stored on secure servers and we have implemented technical and organisational measures that are suitable and necessary to protect your personal data. STUDENT CONNECTS continually evaluates the security of its network and adequacy of its internal information security program which is designed to (a) help secure your data against accidental or unlawful loss, access or disclosure, (b) identify reasonably foreseeable risks to the security of the STUDENT CONNECTS network, and (c) minimize security risks, including through risk assessment and regular testing. In addition, we ensure that all payment data are encrypted using SSL technology.

Please note, despite the measures we have implemented to protect your data, the transfer of data through the Internet or other open networks is never completely secure and there is a risk that your personal data may be accessed by unauthorised third parties.

11. Links to third-party websites

Our Services may contain links to third party websites or apps. If you click on one of these links, please note that each one will have its own privacy policy. We do not control these websites/apps and are not responsible for those policies. When you leave our Services, we encourage you to read the privacy notice of every website you visit.

This policy was last updated in July 2022.