

Privacy Policy — Furnished Rental Group

This Privacy Policy (“Policy”) describes how Furnished Rental Group (“FRG,” “we,” “us,” or “our”) collects, uses, shares, and protects personal data in connection with your use of the FRG Platform, payment services, and any related products or services (collectively, the “Services”).

Your trust is essential to us, and this Policy aims to clearly explain our data practices, your rights, and our obligations under applicable laws, including but not limited to:

- **General Data Protection Regulation (GDPR)** for EEA users
 - **California Consumer Privacy Act (CCPA)** for U.S. residents
 - **Lei Geral de Proteção de Dados (LGPD)** for Brazil
 - **Personal Information Protection Law (PIPL)** for China
 - Local privacy regulations for all other regions
-

1. Data Controller Responsibility

1.1 Primary Data Controller

FRG entity responsible for your personal data depends on your country of residence. See **Annex 1** for details.

1.2 Payments Data Controller

For payment services, FRG Payments entities act as independent controllers or processors as required by financial regulations in your jurisdiction.

1.3 Insurance Data Controller

Where insurance products are offered through FRG, specific FRG Insurance entities handle insurance-related data processing.

2. Personal Data We Collect

We collect the following categories of personal data to provide, improve, and secure our Services:

2.1 Data Required for Using the FRG Platform

- **Contact and Account Information:** name, email, phone, address, date of birth, profile picture.
- **Identity Information:** government-issued IDs, passports, driver's licenses, biometric identifiers (e.g., facial recognition for verification).
- **Payment Information:** credit/debit card details, bank account data, transaction histories.
- **Insurance Information:** data required for insurance eligibility, claims, and administration.

2.2 Data You Provide Voluntarily

- Additional profile information (gender, language preferences, personal bio).
- Data about companions, co-travelers, or third-party payment providers you include in reservations.
- Communication content (messages, calls, support interactions).
- User-generated content (photos, reviews, forums).

2.3 Data Collected Automatically

- **Location Data:** IP address, GPS, device-based geolocation (if enabled).
- **Usage Data:** search history, bookings, services used, access logs.
- **Device Data:** device identifiers, browser settings, crash reports, cookies.

2.4 Data from Third Parties

- Social media integrations (e.g., logging in via Google or Facebook).
- Background check providers (where permitted by law).

- Financial institutions (for chargebacks, payment verification).
 - Government agencies (for regulatory compliance).
-

3. How We Use Personal Data

We process personal data for the following purposes:

3.1 Provide FRG Platform and Services

- Enable bookings, payments, and account management.
- Facilitate communication between Guests and Hosts.
- Deliver customer support and service notifications.

3.2 Improve and Develop the Platform

- Conduct analytics, testing, and service optimization.
- Train support staff and enhance user experience.

3.3 Personalization

- Customize recommendations, search results, and marketing offers based on user behavior and preferences.

3.4 Safety, Security & Compliance

- Detect and prevent fraud, money laundering, or illegal activities.
- Verify identities and authenticate users.
- Comply with legal obligations (tax, financial, law enforcement).

3.5 Marketing & Promotions

- Send promotional communications (with opt-out options).
- Run referral programs, surveys, and campaigns.

3.6 Payment & Insurance Services

- Process transactions securely.
 - Manage insurance subscriptions and claims.
-

4. Data Sharing & Disclosure

We share personal data only as necessary for legitimate business or legal reasons:

4.1 With Consent or Upon Request

When you connect third-party accounts (e.g., Google, Facebook) or use FRG partner services.

4.2 With Other FRG Users

To facilitate bookings, communication, and reviews between Guests and Hosts.

4.3 With Third-Party Service Providers

- IT and cloud infrastructure providers
- Payment processors and financial institutions
- Identity verification and fraud prevention vendors
- Marketing and analytics platforms

4.4 For Regulatory Compliance

- Tax authorities for reporting obligations
- Law enforcement for valid legal requests
- Government agencies requiring licensing or safety compliance

4.5 In Corporate Transactions

In mergers, acquisitions, restructurings, or asset sales, subject to appropriate safeguards.

5. Third-Party Integrations

When linking FRG accounts with external services (e.g., social media, rewards programs), data sharing follows this Policy and third-party privacy terms.

6. Changing Country or Region of Residence

When you move to a new jurisdiction, applicable FRG entity responsibilities and your data protection rights may change accordingly.

7. Your Rights

Subject to local laws (e.g., GDPR, CCPA, LGPD, PIPL), you may:

- Access your personal data.
- Request correction or deletion.
- Object to processing or restrict data use.
- Request data portability.
- Withdraw consent where processing is based on consent.

Contact details for exercising rights are in **Annex 1**.

8. Data Retention

We retain personal data only for:

- As long as accounts remain active,
 - As required by tax, AML, or other legal obligations,
 - As necessary for fraud prevention, dispute resolution, or legal claims.
-

9. Security

We implement administrative, technical, and physical safeguards to protect data against unauthorized access, loss, or disclosure, including:

- Encryption in transit and at rest
 - Access control mechanisms
 - Regular security audits and compliance checks
-

10. Changes to this Policy

We may update this Privacy Policy periodically. Material changes will be communicated via email or in-app notifications at least **30 days before effective date**.

11. Contact Information

Regional FRG Data Protection Officers (DPOs) and contact addresses are listed in **Annex 1** for U.S., EEA, UK, Brazil, China, and other regions.

12. Annex 1 — Regional FRG Entities

A full list of FRG entities, regional offices, and DPO contacts is provided here for transparency and compliance with global privacy regulations.

This **FRG Privacy Policy** mirrors the **Airbnb original structure** while adapting for FRG's business model, covering all **global legal requirements, user rights, data processing details, third-party disclosures, security measures, and regional provisions**.