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DoveVivo S.p.A.

www.joivy.com | fax: +39 02.36697394 | Registered office and headquarters: Viale Monte Nero 6 – 20135 Milan

Operational headquarters:
Via Baccio Baldini 12
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Operational headquarters:
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Operational headquarters:
22 Via Varallo
10153 Turin

Tax ID/VAT No.: 00406960732 - Subscribed and fully paid-in share capital: 1,829,649.81 euros - Milan Business Register No. R.E.A. MI-1838078



PRIVACY POLICY FOR COLIVING, MIRCOLIVING, AND SHARED APARTMENTS

i. Data Controller

The data controller is one of the following companies, depending on the country in which you intend to use the service:

- for Italy, it is Dovevivo S.p.A., Viale Monte Nero 20135 Milan, Italy
- for Spain: Joivy Living Espana SL, Calle Fernandez de la Hoz, 7, Madrid, 28010, Spain
- for France: Someby SAS, 15, rue Jean Bourgey, 69100, Villeurbanne, France
- for Portugal: WHPS Sociedade Unipessoal LDA, Avenida Infante Dom Henrique, No. 26, Lisbon, 1149-096, Portugal

The contact addresses are:

- for Italy: privacy@joivy.com
- for Spain: privacyes@joivy.com
- for France: privacyfr@joivy.com
- for Portugal: privacy@joivy.com

ii. Purpose and Legal Basis of Processing

The personal data collected is processed for the following purposes:

- to respond to requests for information or to book a visit:

The legal basis is found in Article 6(1)(b) of Regulation (EU) 2016/679. The provision of data is necessary to process the request.

- To process the reservation:

The legal basis is found in Article 6(1)(b) of Regulation (EU) 2016/679. The provision of data is necessary to process the request. Payment data is not processed by the Data Controller but directly by the payment service provider.

- Improving products and services:

By regularly monitoring the use of our platform and services, analytical data such as the device ID and IP address are collected. The legal basis is found in Article 6(1)(f) of Regulation 2016/679/EU and the UK General Data Protection Regulation.

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- Marketing:

With the data subject's consent, data may be used to send communications for direct marketing purposes, such as newsletters, event invitations, and commercial information related to the Joivy Group, of which the Data Controller is a part, transmitted via email, mail, SMS, and telephone.

Consent may be revoked at any time by writing toagli or the addresses listed above.

iii. Recipients or categories of recipients to whom personal data may be disclosed

The data is processed by the Data Controller's employees and collaborators in accordance with the instructions provided.

The data may be disclosed to third parties to whom the Data Controller entrusts the performance of certain activities and who act as Data Processors (such as, for example, the company providing IT services or other companies within the Joivy Group).

iv. Retention period

Personal data collected to manage requests for information or to book a visit will be retained for one year from the date of the request by the data subject.

Personal data collected for the management of the reservation will be retained for the period required by law.

Data processed to improve products and services is retained for a maximum of 14 months.

Data processed with the data subject's consent is retained for five years from the last interaction or request by the data subject.

Data processed for sending the newsletter will be retained for as long as the newsletter service is provided, unless the data subject unsubscribes by writing to privacy@joivy.com.

v. Rights of the Data Subject

The data subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and in such a case has the right to:

- access their personal data, request the rectification or erasure of their personal data, or the restriction of the processing of their personal data, or object to such processing;
- receive the personal data concerning them in a structured, commonly used, and machine-readable format and have the right to transmit such data to another data controller (data portability);
- be informed of the existence of automated decision-making, including profiling;

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- if consent has been given, to withdraw it at any time without affecting the lawfulness of processing based on consent given prior to withdrawal;
- to lodge a complaint with the supervisory authority:
 - Italy: Garante per la protezione dei dati personali (<http://www.garanteprivacy.it>)
 - Spain: Agencia Española de Protección de Datos (<http://www.aepd.es>)
 - France: Commission Nationale de L'Informatique et des Libertés (www.cnil.fr)
 - Portugal: CNPD (National Data Protection Commission) (<https://www.cnpd.pt>)

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PRIVACY NOTICE FOR VACATION & CORPORATE TRAVEL

i. Data Controller

The data controller is one of the following companies depending on the country where you intend to use the service:

- for Italy, it is Altido Italy S.r.l., Viale Monte Nero 20135 Milan, Italy
- for Spain, it is Joivy Living Espana SL, Calle Fernandez de la Hoz, 7, Madrid, 28010, Spain
- for France: Someby SAS, 15, rue Jean Bourgey, 69100, Villeurbanne, France
- for Scotland: Altido Scotland Limited, 14-16 Jackson's Entry, EH8 8PJ, Edinburgh, Scotland
- for Ireland: Altido Scotland Limited, 14-16 Jackson's Entry, EH8 8PJ, Edinburgh, Scotland
- for England: Altido London Limited, Hamilton House, Mabledon Place, London WC1H 9BB, England

All companies can be contacted at privacy.travel@joivy.com

ii. Purpose and Legal Basis of Processing

The personal data collected is processed for the following purposes:

- Responding to requests for information:

The legal basis is found in Article 6(1)(b) of Regulation (EU) 2016/679 and the UK General Data Protection Regulation. The provision of data is necessary to process the request

- Processing the reservation:

Certain information is collected about the person making the reservation and their guests (name, email addresses, contact details, length of stay, and photo ID; in some cases, also date of birth, residential address, and gender). The legal basis is found in Article 6(1)(b) of Regulation (EU) 2016/679 and the UK General Data Protection Regulation. The provision of data is necessary to process the request. Payment data is not processed by the Data Controller but directly by the payment service provider.

- To check in and use the features available on the Guest Portal:

Information regarding the reservation is collected, including dates, extras, and destination. Where required, we use this information to pay the tourist tax or to provide information to local authorities. The legal basis is found in Article 6(1)(b) of Regulation (EU) 2016/679 and the UK General Data Protection Regulation. The provision of data is necessary to process the request.

- Providing the requested services:

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We collect the data necessary to provide the requested service. The legal basis is found in Article 6(1)(b) of Regulation (EU) 2016/679 and the UK General Data Protection Regulation. The provision of data is necessary to process the request.

- *To perform contractual obligations toward property owners:*

We collect the data necessary to perform contractual obligations toward property owners.

When a property owner decides on which platforms (Online Travel Agencies) they wish to be listed, we will share the owner's name, email address, and property listing details with these other platforms. The legal basis is found in Article 6(1)(b) of Regulation (EU) 2016/679 and the UK General Data Protection Regulation. The provision of data is necessary to process the request.

- *Improving products and services:*

By regularly monitoring the use of our platform and services, we collect analytical data such as device ID and IP address. The legal basis is found in Article 6(1)(f) of Regulation (EU) 2016/679 and the UK General Data Protection Regulation.

- *Marketing:*

With the data subject's consent, data may be used to send communications for direct marketing purposes, such as newsletters, event invitations, and commercial information related to the Joivy Group, of which the Data Controller is a part, transmitted via email, mail, SMS, and telephone.

Consent may be revoked at any time by writing to privacy.travel@joivy.com.

iii. Recipients or categories of recipients to whom personal data may be disclosed

The data is processed by the Data Controller's employees and collaborators in accordance with the instructions provided.

The data may be disclosed to third parties to whom the Data Controller entrusts the performance of certain activities and who act as Data Processors (such as, for example, the company providing IT services or other companies within the Joivy Group).

To perform the requested services, the data is shared with trusted partners whom the Data Controller relies on to carry out the service. The legal basis justifying the disclosure of the data is found in Article 6(1)(b) of Regulation (EU) 2016/679 and the UK General Data Protection Regulation.

iv. Retention Period

Personal data collected to manage requests for information will be retained for one year from the date of the request by the data subject.

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Personal data collected to verify the identity of the person making the reservation is retained for one month after check-in, while other data processed for the management of the reservation is retained for the period required by law.

Personal data collected to provide the requested services and fulfill contractual obligations to property owners is retained for the period required by law.

Data processed to improve products and services is retained for up to 14 months.

Data processed with the data subject's consent is retained for five years from the last interaction or request by the data subject.

Data processed for sending the newsletter is retained for as long as the newsletter service is provided, unless the data subject unsubscribes by writing to privacy@joivy.com.

v. Rights of the Data Subject

The data subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and in such a case has the right to:

- access their personal data, request the rectification or erasure of their personal data, or the restriction of the processing of their personal data, or object to such processing;
- receive the personal data concerning them in a structured, commonly used, and machine-readable format and have the right to transmit such data to another data controller (data portability);
- be informed of the existence of automated decision-making, including profiling;
- if consent has been given, to withdraw it at any time without affecting the lawfulness of processing based on consent given prior to withdrawal;
- to lodge a complaint with the supervisory authority:
 - Italy: Garante per la protezione dei dati personali (<http://www.garanteprivacy.it>)
 - Spain: Agencia Española de Protección de Datos (<http://www.aepd.es>)
 - France: Commission Nationale de L'Informatique et des Libertés (www.cnil.fr)
 - Ireland: Data Protection Commission (<http://www.dataprotection.ie>)
 - United Kingdom: Information Commissioner's Office (<http://ico.org.uk>)

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PRIVACY NOTICE FOR STUDENT HOUSING AND PBSA

i. Data Controller

The data controller is Joivy Campus S.r.l., Viale Monte Nero 6 – 20135 Milan, amministrazione.campus@joivy.com

ii. Purposes and Legal Basis of Processing

The personal data collected is processed for the following purposes:

- to respond to requests for information or process a reservation:

The legal basis is found in Article 6(1)(b) of Regulation (EU) 2016/679.

Providing the data is necessary to process the request.

- to improve products and services:

By regularly monitoring the use of our platform and services, we collect analytical data such as device ID and IP address. The legal basis is found in Article 6(1)(f) of Regulation (EU) 2016/679 and the UK General Data Protection Regulation.

- Marketing:

With the data subject's consent, data may be used to send communications for direct marketing purposes, such as newsletters, event invitations, and commercial information related to the Joivy Group, of which the Data Controller is a part, transmitted via email, mail, SMS, and telephone.

Consent may be revoked at any time by writing to amministrazione.campus@joivy.com

iii. Recipients or categories of recipients to whom personal data may be disclosed

The data is processed by the Data Controller's employees and collaborators in accordance with the instructions provided.

The data may be disclosed to third parties to whom the Data Controller entrusts the performance of certain activities and who act as Data Processors (such as, for example, the company providing IT services or other companies within the Joivy Group).

iv. Retention period

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Personal data collected to process requests for information will be retained for one year from the date of the request by the data subject.

Personal data collected for the purpose of managing reservations will be retained for the period required by law.

Data processed to improve products and services is retained for a maximum of 14 months.

Data processed with the data subject's consent is retained for five years from the last interaction or request by the data subject.

Data processed for sending the newsletter will be retained for as long as the newsletter service is provided, unless the data subject unsubscribes by writing to privacy@joivy.com.

v. Rights of the Data Subject

The data subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and in such a case has the right to:

- access their personal data, request the rectification or erasure of their personal data, or the restriction of the processing of their personal data, or object to such processing;
- receive the personal data concerning them in a structured, commonly used, and machine-readable format and have the right to transmit such data to another data controller (data portability);
- be informed of the existence of automated decision-making, including profiling;
- if consent has been given, to withdraw it at any time without affecting the lawfulness of processing based on consent given prior to withdrawal;
- to lodge a complaint with the supervisory authority:
 - Italian Data Protection Authority (<http://www.garanteprivacy.it>)

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PRIVACY POLICY FOR CONTACT US

i. Data Controller

The data controller is Dovevivo S.p.A., Viale Monte Nero 6 – 20135 Milan, privacy@joivy.com

ii. Purpose and Legal Basis of Processing

The personal data collected is processed for the following purposes:

- to respond to requests from the data subject:

The legal basis is found in Article 6(1)(b) of Regulation (EU) 2016/679. The provision of data is necessary to process the request.

- Improving products and services:

By regularly monitoring the use of our platform and services, analytical data such as device ID and IP address are collected. The legal basis is found in Article 6(1)(f) of Regulation (EU) 2016/679 and the UK General Data Protection Regulation.

- Marketing:

With the data subject's consent, the data may be used to send communications for direct marketing purposes, such as newsletters, event invitations, and commercial information related to the Joivy Group, of which the Data Controller is a part, transmitted via email, mail, SMS, and telephone.

Consent may be revoked at any time by writing to privacy@joivy.com.

iii. Recipients or categories of recipients to whom personal data may be disclosed

The data is processed by the Data Controller's employees and collaborators in accordance with the instructions provided.

The data may be disclosed to third parties to whom the Data Controller entrusts the performance of certain activities and who act as Data Processors (such as, for example, the company providing IT services and other companies within the Joivy Group).

iv. Retention period

Personal data collected to manage the request for information will be retained for one year from the date of the request by the data subject.

Data processed to improve products and services is retained for a maximum of 14 months.

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Data processed with the data subject's consent is retained for five years from the last interaction/request by the data subject.

Data processed for sending the newsletter is retained for as long as the newsletter service is provided, unless the data subject unsubscribes by writing to privacy@joivy.com.

v. Rights of the Data Subject

The data subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and in such a case has the right to:

- access their personal data, request the rectification or erasure of their personal data, or the restriction of the processing of their personal data, or object to such processing;
- receive the personal data concerning them in a structured, commonly used, and machine-readable format and have the right to transmit such data to another data controller (data portability);
- be informed of the existence of automated decision-making, including profiling;
- if consent has been given, to withdraw it at any time without affecting the lawfulness of processing based on consent given prior to withdrawal;
- to lodge a complaint with the supervisory authority:
 - Data Protection Officer (<http://www.garanteprivacy.it>)

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PRIVACY NOTICE FOR WORK WITH US

i. Data Controller

The data controller is Dovevivo S.p.A., Viale Monte Nero 6 – 20135 Milan, privacy@joivy.com

ii. Purpose and Legal Basis of Processing

The personal data collected is processed for the purpose of evaluating the applicant's candidacy and is shared with the Joivy Group company involved in the hiring process. The data is processed in accordance with Article 6(1)(b) of Regulation (EU) 2016/679.

iii. Recipients or categories of recipients to whom personal data may be disclosed

The data is processed by the Data Controller's employees and collaborators in accordance with the instructions provided.

The data may be disclosed to third parties to whom the Data Controller entrusts the performance of certain activities and who act as Data Processors (such as, for example, the company providing IT services and other companies within the Joivy Group).

iv. Retention period

The personal data collected will be retained for two years.

v. Rights of the data subject

The data subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and in such a case has the right to:

- access their personal data, request the rectification or erasure of their personal data, or the restriction of the processing of their personal data, or object to such processing;
- receive the personal data concerning them in a structured, commonly used, and machine-readable format and have the right to transmit such data to another data controller (data portability);
- be informed of the existence of automated decision-making, including profiling;
- if consent has been given, to withdraw it at any time without affecting the lawfulness of processing based on consent given prior to withdrawal;
- to lodge a complaint with the supervisory authority:
 - Italian Data Protection Authority (<http://www.garanteprivacy.it>)

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NEWSLETTER PRIVACY POLICY

i. Data Controller

The data controller is Dovevivo S.p.A., Viale Monte Nero 6 – 20135 Milan, privacy@joivy.com

ii. Purpose and Legal Basis of Processing

Personal data is collected solely for the purpose of sending you the newsletter of the companies in the Joivy Group, of which DoveVivo S.p.A. is a part. The provision of data is necessary to carry out this processing. The legal basis for the processing is found in Article 6(1)(b) of Regulation (EU) 2016/679

iii. Recipients or categories of recipients to whom personal data may be disclosed

The data is processed by the Data Controller's employees and collaborators in accordance with the instructions provided.

The data may be disclosed to third parties to whom the Data Controller entrusts the performance of certain activities and who act as Data Processors (such as, for example, the company providing IT services and other companies within the Joivy Group).

iv. Retention period

The data is retained for as long as the newsletter service is provided, unless the data subject unsubscribes by writing to privacy@joivy.com.

v. Rights of the data subject

The data subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and in such a case has the right to:

- access their personal data, request the rectification or erasure of their personal data, or the restriction of the processing of their personal data, or object to such processing;
- receive the personal data concerning them in a structured, commonly used, and machine-readable format and have the right to transmit such data to another data controller (data portability);
- be informed of the existence of automated decision-making, including profiling;
- if consent has been given, to withdraw it at any time without affecting the lawfulness of processing based on consent given prior to withdrawal;
- to lodge a complaint with the supervisory authority;

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JOIVY APP PRIVACY POLICY

i. Data Controller

The data controller is Dovevivo S.p.A., Viale Monte Nero 6 – 20135 Milan, privacy@joivy.com

ii. Purpose and Legal Basis of Processing

Personal data is collected to register for the Joivy App. Providing this data is necessary to complete the registration. The legal basis for the processing is found in Article 6(1)(b) of Regulation (EU) 2016/679

iii. Recipients or categories of recipients to whom personal data may be disclosed

The data is processed by the Data Controller's employees and collaborators in accordance with the instructions provided.

The data may be disclosed to third parties to whom the Data Controller entrusts the performance of certain activities and who act as Data Processors (such as, for example, the company providing IT services and other companies within the Joivy Group).

iv. Retention period

The data is retained for as long as the app is active, unless the data subject revokes their registration by writing to privacy@joivy.com.

v. Rights of the data subject

The data subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed and, if so, has the right to:

- access their personal data, request the rectification or erasure of their personal data, or the restriction of the processing of their personal data, or object to such processing;
- receive the personal data concerning them in a structured, commonly used, and machine-readable format and have the right to transmit such data to another data controller (data portability);
- be informed of the existence of automated decision-making, including profiling;
- if consent has been given, to withdraw it at any time without affecting the lawfulness of processing based on consent given prior to withdrawal;
- to lodge a complaint with the supervisory authority:
 - Italian Data Protection Authority (<http://www.garanteprivacy.it>)

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