## **Privacy Policy – Rumbl Rentals**

Rumbl Rentals (Rumbl Limited Partnership)
Last Updated: 12/08/2025

#### 1. Introduction

This Privacy Policy ("Policy") explains how Rumbl Rentals, operated by Rumbl Limited Partnership, located at P.O Box 154, 100 Randall Road, Wrentham, MA 02093 ("Rumbl," "we," "us," "our"), collects, uses, processes, stores, shares, and protects personal information when individuals ("Users," "you") access or use the Rumbl Rentals website, services, tools, applications, and booking platform (collectively, the "Platform").

Rumbl is committed to protecting your privacy and complying with all applicable privacy laws, including:

- United States federal and state privacy laws
- CCPA/CPRA (California)
- **PIPEDA** (Canada)
- CASL (Canada)
- GDPR & UK GDPR (European Economic Area and United Kingdom)
- Any other relevant international data protection regulations

By accessing or using the Platform, creating an account, listing an accommodation, booking a stay, or otherwise providing information to Rumbl, you acknowledge that you have read and understood this Policy.

If you do not agree with this Policy, you must stop using the Platform.

For Users in the European Economic Area, our EU Representative is located at **P.O Box 154, 100 Randall Road, Wrentham, MA 02093**, reachable at **support@rumblrentals.com**. For Users in the United Kingdom, our UK Representative is located at **P.O Box 154, 100 Randall Road, Wrentham, MA 02093**, reachable at **support@rumblrentals.com**.

#### 2. Information We Collect

Rumbl collects information in several categories.

## 2.1 Information You Provide Directly

#### This includes:

- Name, email address, phone number
- Physical address
- Account credentials
- Profile details (photo, biography, preferences)
- Government-issued identification for verification
- Selfie/biometric verification data (where required)
- Payment information (processed through third-party providers)
- Property details and descriptions (for Hosts)
- Booking, stay, and transaction history
- Communications with Hosts, Guests, or Rumbl
- Messages sent through the Platform
- Reviews and ratings
- Support inquiries and customer service interactions

## 2.2 Information Automatically Collected

When you use the Platform, Rumbl automatically collects:

- IP address
- Device identifiers
- Browser type and version
- Operating system
- Geo-location metadata (approximate)
- Access times and usage patterns
- Search history and filters
- Clickstream and navigation behavior
- Log files
- Cookies and tracking technologies
- Device signals used for fraud detection
- Metadata associated with photos or content you upload

#### 2.3 Information from Third Parties

Rumbl may receive data from:

- Identity verification partners
- Background or fraud-screening tools
- Payment processors
- Social login providers (e.g., Google, Facebook, Apple)
- Publicly available records
- Hosting partners

- Travel or mapping integrations
- Municipal or regulatory agencies (where required)

Rumbl may combine information from these sources with information you provide.

#### 3. How We Use Your Information

Rumbl uses personal information for the following purposes:

## 3.1 To Operate and Provide the Platform

- Creating and managing User accounts
- Publishing and displaying Listings
- Facilitating bookings, payments, messaging, and check-in procedures
- Sending confirmations, receipts, notifications, and updates

## 3.2 To Ensure Safety, Trust, and Compliance

- Identity verification
- Fraud detection and prevention
- Risk scoring
- Monitoring for prohibited activities
- Compliance with safety and legal requirements
- Enforcement of Terms of Service

#### 3.3 To Improve and Develop the Platform

- Troubleshooting
- Data analytics
- Feature development
- Quality and performance evaluation
- User experience optimization

#### 3.4 To Communicate with You

- Platform updates
- Transactional emails
- Customer service responses
- Marketing communications (based on consent or legitimate interest)
- Promotional offers (opt-out available at any time)

## 3.5 For Legal, Regulatory, and Compliance Purposes

- Tax reporting
- Municipal short-term rental compliance
- Responding to lawful requests
- Preventing harm or illegal activity
- Enforcing agreements and policies

# 4. Legal Bases for Processing (GDPR and UK GDPR)

If you reside in the European Economic Area, Switzerland, or the United Kingdom, Rumbl processes your personal data based on the following legal grounds:

- Contractual necessity (e.g., facilitating bookings or payments)
- Legitimate interests (e.g., fraud prevention, platform safety)
- Legal obligations (e.g., regulatory compliance, tax laws)
- Consent (e.g., marketing communications, optional features)

You may withdraw consent at any time.

#### 5. How We Share Your Information

Rumbl shares personal information only in the ways described below.

#### **5.1 With Other Users**

To facilitate bookings and communication:

- Hosts receive relevant Guest information
- Guests may receive relevant Host information
- Message content may be shared between parties

#### **5.2 With Third-Party Service Providers**

#### Including:

- Payment processors
- Identity verification platforms
- Fraud prevention services

- Customer support systems
- Cloud hosting providers
- Analytics and marketing tools
- Communication and SMS partners

Service providers process data under contract and are prohibited from using it outside the scope of their services.

## **5.3 With Government or Regulatory Entities**

Rumbl may disclose information when:

- Required by law or legal process
- Responding to subpoenas, court orders, or law enforcement requests
- Required by municipal short-term rental programs
- Necessary to protect life, property, and safety

#### **5.4 With Affiliates or Corporate Transactions**

We may share or transfer data in connection with:

- Mergers
- Acquisitions
- Asset sales
- Financing
- Bankruptcy proceedings

#### **5.5 Public Content**

Certain User Content is publicly visible:

- Host Listings
- Reviews
- Host or profile photos (if enabled)

Rumbl does **not** sell personal information as defined under CCPA/CPRA.

#### 6. International Data Transfers

Rumbl stores and processes personal information in:

• The United States

- Canada (where applicable)
- Other jurisdictions where service providers operate

If you reside outside these regions, your information may be transferred to countries with privacy laws different from your own.

Where required, Rumbl uses:

- Standard Contractual Clauses (SCCs)
- Additional contractual safeguards
- Adequacy decisions

#### 7. Data Retention

Rumbl retains personal information for as long as necessary to:

- Provide services
- Support operational requirements
- Comply with legal obligations
- Resolve disputes
- Enforce agreements
- Detect and prevent fraud

Retention periods depend on:

- The nature of the data
- Legal and tax requirements
- Ongoing disputes or investigations

# 7.1 Account Information (name, email, phone, profile details)

Retained for the duration of the user's account and for up to 5 years after account closure for:

- Fraud prevention
- Compliance with financial and legal obligations
- Resolution of disputes

# 7.2 Identity Verification Data (government ID, biometric checks, address verification)

Retained for **up to 3 years after verification** or account closure, whichever is later, unless required longer for:

- Fraud or safety investigation
- Legal claims
- Compliance with KYC or verification requirements

## 7.3 Booking and Transaction Records

Includes booking history, invoices, receipts, pricing, fees, taxes, and payout records.

Retained for 7 years to comply with:

- Tax regulations
- Financial reporting laws
- Audit requirements

(This timeframe aligns with U.S. IRS and Canadian CRA recordkeeping standards.)

## 7.4 Communications and Messaging

Messages between Hosts, Guests, and Rumbl support.

Retained for up to 5 years after the booking or communication event to support:

- Dispute resolution
- Safety investigations
- Fraud prevention
- Platform integrity

#### 7.5 Payment Method Information

Rumbl does not store full payment card details.

Tokenized payment identifiers and billing metadata are retained for **up to 7 years**, consistent with financial record requirements.

#### 7.6 User-Generated Content (reviews, ratings, photos, listing information)

Retained until removed by the User or for up to 5 years after account closure unless required longer for fraud, safety, or dispute purposes.

## 7.7 Device, Log, and Analytics Data

Includes IP addresses, device metadata, cookies, behavioral analytics, and session data.

#### Retained for:

- Up to 2 years for analytics
- Up to 5 years for fraud and security logging

Certain aggregated or anonymized datasets may be retained indefinitely where legally permissible.

## 7.8 Safety, Fraud, and Risk-Scoring Data

Includes risk profiles, safety reports, internal flags, and fraud detection identifiers.

Retained for **up to 7 years** or longer when necessary to:

- Prevent repeat fraud
- Maintain platform safety
- Comply with law enforcement requests

## 7.9 Legal Requests, Regulatory Inquiries, and Dispute Documentation

Retained for the duration of the investigation or proceeding and for up to 7 years thereafter.

#### 7.10 Cookies and Tracking Technologies

Retention varies by cookie type:

- Session cookies: deleted when browsing session ends
- Analytics cookies: up to 24 months
- Advertising cookies: up to 13 months (GDPR-compliant)

See Rumbl's Cookie & Tracking Policy for full details.

## 7.11 Retention Beyond Standard Periods

Rumbl may retain data beyond the above periods where:

- Required by law
- Necessary to protect Rumbl's legal rights
- Related to an active investigation or dispute
- Needed to maintain the integrity of the Platform

After retention periods expire, data is:

- Securely deleted
- Anonymized
- Aggregated for non-identifying use

# 8. User Rights

Depending on your jurisdiction, you may have the following rights:

## 8.1 Under GDPR/UK GDPR

- Access your personal data
- Correct inaccuracies
- Request deletion ("right to be forgotten")
- Restrict processing
- Object to processing (including marketing)
- Data portability
- Withdraw consent

## 8.2 Under CCPA/CPRA (California)

You may request:

- Categories of personal information collected
- Specific pieces of information collected
- Deletion of personal information
- Correction of inaccurate data
- Information about data shared with third parties
- To opt-out of data sharing or certain uses

Rumbl will not discriminate against Users for exercising their rights.

## 8.3 Under PIPEDA (Canada)

## You may:

- Access your data
- Request corrections
- Withdraw certain consents
- Challenge compliance

To exercise any rights, email: admin@rumblrentals.com Verification of identity may be required.

# 9. Cookies and Tracking Technologies

#### Rumbl uses:

- Essential cookies
- Functionality cookies
- Analytics tools
- Fraud detection signals
- Session tracking
- Pixel tags

Users may manage cookie preferences via browser settings. Disabling cookies may limit Platform functionality.

# 10. Children's Privacy

The Platform is not intended for individuals under **18 years old**. Rumbl does not knowingly collect information from children.

If a minor's information is discovered, it will be deleted promptly.

# 11. Security

Rumbl implements industry-standard protections:

- Encryption
- Secure hosting environments
- Access controls
- Firewalls
- Multi-factor authentication
- Intrusion detection
- Monitoring systems

However, no system is 100% secure. Users transmit information at their own risk.

# 12. Communications and Marketing

Rumbl may send:

- Transactional messages
- Booking updates
- Security alerts
- Policy changes
- Promotional messages (opt-out available)

Users may unsubscribe from marketing communications at any time.

# 13. Third-Party Links

The Platform may contain links to external websites or services not operated by Rumbl. We are not responsible for their privacy practices or content.

# 14. Changes to This Policy

Rumbl may update this Policy periodically. Changes become effective upon posting.

The "Last Updated" date will reflect major revisions.

Continued use of the Platform signifies acceptance of updated policies.

#### 15. Contact Information

For questions, concerns, or rights requests:

# **Rumbl Limited Partnership**

P.O. Box 154 100 Randall Road Wrentham, MA 02093 United States

Email: admin@rumblrentals.com

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