

PRIVACY POLICY

Rental Focus LLC

DRAFT TEMPLATE — prepared for Rental Focus LLC for review by a Massachusetts-licensed attorney and the company's insurance broker before use. Bracketed items [] must be completed. Not legal advice.

This Privacy Policy explains how Rental Focus LLC, a Massachusetts limited liability company with its principal office in Dorchester, Boston, Massachusetts 02124 [insert full street address] ("Rental Focus") collects, uses and protects personal information when you use rentalfocus.us, our apps and services. Effective date: [insert date].

1. Information We Collect

- **Account and identity:** name, email, phone, address, date of birth, photo, driver's license details and images, and for businesses, company and authorized-driver details.
- **Verification:** results of identity, driving-record and fraud checks from service providers (with any authorization required by law).
- **Booking and vehicle data:** reservations, vehicle details, condition photos, mileage, fuel and, where a vehicle has a disclosed tracking device, location data during a rental.
- **Payment:** payment card and payout account information, processed and stored by our PCI-compliant payment processor; we do not store full card numbers.
- **Communications:** messages, reviews, support requests and call recordings (with notice).
- **Device and usage:** IP address, browser, pages viewed and cookies used for security, preferences and analytics.

2. How We Use Information

- Provide, operate and secure the Platform and process bookings, payments and payouts;
- Verify identity and eligibility and prevent fraud, theft and misuse;
- Administer agreements, damage claims, tolls and citations, and comply with legal obligations (including tax and law-enforcement requests);
- Communicate with you about bookings, services, updates and, with your consent, marketing;
- Improve our services and develop new features.

3. How We Share Information

We share information only as needed: between Owners and Renters for a booking (for example, name, verified status and handover details); with Service Partners to perform a job you request; with insurers, claims administrators and payment processors; with identity-verification, hosting, communications and analytics providers bound by contract; with authorities to transfer toll or citation responsibility or when required by law; and in a merger or sale of our business. **We do not sell personal information.**

4. Data Security

We maintain a written information security program designed to meet the Massachusetts data security regulations (201 CMR 17.00), including encryption of personal information in transit and on portable devices, access controls and employee training. If a security breach affects your personal information, we will notify you and the authorities as required by M.G.L. c. 93H.

5. Retention

We keep information for as long as your account is active and afterwards as needed for legal, tax, insurance and dispute purposes (generally up to 7 years for rental and payment records), then delete or de-identify it. Driver's license images are deleted [] days after account closure unless needed for an open claim.

6. Your Choices and Rights

- Access, correct or delete your information by emailing privacy@rentalfocus.us [confirm address]; we may keep records the law requires.
- Opt out of marketing emails using the unsubscribe link and of texts by replying STOP.
- Control cookies through your browser settings.
- Residents of states with consumer privacy laws may have additional rights, which we will honor as required.

7. Children

The Platform is not directed to children under 13, and accounts are for adults 18 and older.

8. Changes and Contact

We will post any changes here and notify you of material changes. Questions: Rental Focus LLC, Dorchester, Boston, MA 02124 • info@rentalfocus.us • +1 (857) 701-6188.