

## CoStar Group and the Global DPA

### How our Modular Data Processing Terms Work

(Last Updated: January 15, 2026)

#### What is the CoStar Global DPA?

The CoStar Global Data Processing Addendum (DPA) is a single set of privacy and data-protection terms that applies across CoStar Group brands, including CoStar core products, Apartments.com, Homes.com, LoopNet, STR, Matterport, Visual Lease and Real Estate Manager (REM). It is designed to work with GDPR, UK and Swiss law, and newer U.S. state privacy laws, so you do not need separate data-protection addenda for each product or brand.

#### Is CoStar a controller or a processor

In many cases, CoStar acts as an independent controller. For core platform data – user accounts, product usage, analytics, lead routing and similar – CoStar determines why and how personal data is used. In GDPR terms, CoStar is an independent controller, just as you are a controller for your own systems.

CoStar acts as a **processor / Service Provider / Contractor** only for specific datasets and use cases. This is typically where you send us your own data purely, so we can act on your documented instructions – for example, customer provided lists (e.g. CRM or suppression lists) used solely to provide the applicable products or services on your instructions. In those cases, we follow your instructions and contractual obligations to provide the relevant Products/Services. The DPA does not treat all processing as “processor” activity; it describes the controller and processor roles separately and clearly.

#### What does “modular” mean?

The DPA is modular so that it applies in different ways depending on what you purchase and how we handle data for you. The applicable role (controller/processor) is determined by the product use case and the datasets described in Annex A and the schedules, not by a separate signature, checkbox or designation.

**Brand / product module – Annex A.** Annex A is a brand matrix. For each brand, it shows where CoStar acts **only as a controller**, and where CoStar also acts as a **processor / Service Provider**, and for which datasets (for example, hosted CRM lists or lease data). If you purchase a product listed in Annex A, the relevant row automatically tells you which parts of the DPA apply. No additional order-form checkboxes are required.

**Role module – controller vs processor.** Section 3 governs controller-to-controller sharing between you and CoStar. Section 4 applies only where CoStar is acting as your processor / Service Provider.

## Is there a difference between products and services in the DPA?

No. Products/Services is used as a Catch-all the CoStar offering you purchase (including SaaS access and related support and professional services). Your privacy roles and obligations depend on how personal data is processed (controller vs. processor), not whether something is labeled as a product or service.

## What if I am purchasing Matterport, Visual Lease and/or REM services or products?

**Matterport.** Matterport generally operates its platform and capture services as an independent controller. Matterport's platform is not intended to include personal data and Matterport acts as a processor only in very limited cases where we are required to process content that contains personal data despite this intention. The CoStar Global DPA reflects this position and incorporates Matterport's existing security measures and subprocessor list by reference.

**Visual Lease and Real Estate Manager.** Visual Lease and Real Estate Manager typically act as a processors for your lease data that you upload into the application. Under the DPA, Visual Lease and Real Estate Manager are **controllers** for their own platform and operational data (e.g., login and authentication criteria data) and **processors / Service Providers** for customer-submitted lease data, processed only on your instructions. Annex A makes this split clear, and Visual Lease's and Real Estate Manager's technical and organizational measures and subprocessors are reflected in the schedules.

## What about Article 28, SCCs and international transfers?

The DPA includes the required Article 28 processor terms for situations where CoStar acts as your processor. It also incorporates the 2021 EU Standard Contractual Clauses (Modules 1 and 2), together with the UK Addendum and Swiss add-on. A separate schedules document explains which SCC module applies in which situation. You do not need a separate SCC agreement; it is already included as part of the CoStar Global DPA.

The SCCs are incorporated by reference and are intended to be self-executing: they apply automatically where an international transfer requires them. The relevant SCC module, parties, and transfer details are completed through the DPA schedules/annexes and our published documentation (e.g., subprocessor and security schedules) rather than issuing separate SCC documents per affiliate or product.

## Where can I find the Annex and Schedules?

They are published with Global DPA online at: [www.https://costar.com/about/terms-conditions-costar-dpa](https://costar.com/about/terms-conditions-costar-dpa), and incorporated as part of your Agreement by reference.