

# PRIVACY POLICY

## 1. PURPOSE

HomeRiver Group support the protection of individual privacy and is committed to ensuring the confidentiality of Personal Information provided by its employees, homeowner clients, and other members of the HomeRiver Group community. This privacy policy provides a general description of the ways we collect information about individuals, how we may use or disclose this information, and how we safeguard this information.

## 2. SCOPE

This privacy policy covers the business practices of HomeRiver Group and applies to:

- The use of our Sites that display our privacy notice or link to our privacy notice page
- Former, current and prospective clients, broker, independent agents and customers

This Policy excludes former, current and prospective employees – please refer to the Employee Privacy Policy.

## 3. DEFINITIONS

**Personal Information or Personally Identifiable Information (PII).** Information that identifies, relates to, describes, or is reasonably capable of being associated, linked, or linkable with a particular individual. Personal Information includes individual names, email addresses, postal addresses, telephone numbers, usernames/passwords, and other information specific to individuals.

## 4. POLICY

### ONLINE PRIVACY NOTICE

HomeRiver Group supports the protection of individuals who visit official HomeRiver Group websites (the “Sites”) and it recognizes the numerous laws that govern the collection, storage, transfer, use and access to Personal Information. HomeRiver group will provide a notice of its

privacy policies on its Sites that explain its collection of all Personal Information, regardless of source or medium. This Policy does not apply to websites that are created and maintained by HomeRiver Group employees or contractors for purposes other than conducting official HomeRiver Group business.

For website administration purposes, non-Personal Information is collected for analysis (“Usage Information”). Usage Information includes, but is not limited to, number of visitors, number of page views, IP addresses, website pages visited prior to visiting the Site(s), browser information, technical information about devices, systems, software, and peripherals. Usage Information is used to be used to help diagnose problems, assess what information is of most interest, determine technical design specifications, cookies may be enable to track visitors’ age, gender and interests, system performance, and other administrative functions.

## OUR COLLECTION OF PERSONAL INFORMATION

It is the practice of HomeRiver Group to collect the least amount of Personal Information required to market its services, provide services to its clients, to complete required business transactions, and as required by law. Generally, we collect Personal Information on a voluntary basis; however, an individual that chooses not to disclose Personal Information may be unable to access certain options, offers or services.

### 5. RESPONSIBLE EXECUTIVE(S) AND DEPARTMENT(S)

**Sources of Personal Information we collect.** The Personal Information that we collect and process will vary depending upon the circumstances. We collect Personal Information directly from individuals, automatically from information related to the use of the Sites, and in some cases, from third parties (such as social networks, platform providers, marketing partners, payment processors, data providers, and operators of certain third-party services that we use). For example, some of the ways we collect information are as follows:

***Information we collect directly.*** We collect information that you provide to us, such as:

- when you create an account, provide contact information, and send other Personal Information to us;
- when you complete or submit a form through our Sites, for example, "Contact Us" or “More Information” forms;
- when you participate in surveys or contests, submit orders or requests, or register for or use our Sites, or otherwise contact us; and

- information you submit or provide such as real estate searches and preferences, whether you plan on buying, selling, leasing or renting real estate, home search criteria, information about financing for the purchase of real estate, and other information related to the real estate.

**Information we collect from third parties.** We may collect Personal Information about you and your property from third party sources, such as public databases, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected), from brokers and independent agents of HomeRiver Group brands, and from other third parties. For example, without limitation:

- Social media. If you choose to link, create, or log in to your Site account with a social media service (e.g., Twitter, Facebook, Instagram, etc.), or if you engage with a separate app or website that communicates with the Sites, we may receive Personal Information about you or your connections from that service. In many cases you can control what Personal Information you share with us through privacy settings available on those third-party social media services.
- Real estate professionals. Information that may include, among other things, your name and email address, that you may have given to an independent real estate professional with whom you have a pre-existing relationship. The professional may collect such Personal Information from you with the sole purpose of pre-populating an account for the Sites on your behalf and with your consent. You may choose not to finalize the creation of an account and may opt-out of certain future communications from us by following the instructions in the account creation notification or by contacting us at the email address in this Policy.
- Property records. We may collect information about individuals and real estate property through public databases, such as property ownership and tax records maintained by state, local and county agencies.

#### USE OF PERSONAL INFORMATION

While the purposes for which we may process Personal Information will vary depending upon the circumstances, in general we use Personal Information for the purposes set forth below:

- **Providing support and services:** including, for example, to send or facilitate communications among you, independent real estate professionals and their affiliated entities, and other users of the Services, provide products and services you request (and send related information), operate our Services; to communicate with you about your access to and use of our Services; to respond to your inquiries; to provide troubleshooting,

fulfill your requests and provide technical support; and for other customer service and support purposes.

- **Analyzing and improving our business:** including to better understand how users access and use our Sites, to evaluate and improve our Sites and business operations, and to develop new features, offerings, and services; to conduct surveys, and other evaluations, such as customer satisfaction surveys; and for other research and analytical purposes. • **Personalizing content and experiences:** including to provide or recommend features, content, social connections, and referrals; tailor content we send or display on our Sites; to offer location customization and personalized help and instructions; and to otherwise personalize your experiences.
- **Advertising, marketing and promotional purposes:** including to reach you with more relevant ads and to evaluate, measure, and improve the effectiveness of our ad campaigns; to send you newsletters, offers, or other information we think may interest you; to contact you about our services or information we think may interest you; and to administer promotions and contests.
- **Securing and protecting our business:** including to protect and secure our business operations, assets, Sites, network and information and technology resources; to investigate, prevent, detect and take action regarding fraud, unauthorized access, situations involving potential threats to the rights or safety of any person or third party, or other unauthorized activities or misconduct. • **Defending our legal rights:** including to manage and respond to actual and potential legal disputes and claims, and to otherwise establish, defend or protect our rights or interests, including in the context of anticipated or actual litigation with third parties.
- **Auditing, reporting, corporate governance, and internal operations:** including relating to financial, tax and accounting audits; audits and assessments of our operations, privacy, security and financial controls, risk, and compliance with legal obligations; our general business, accounting, record keeping and legal functions; and related to any actual or contemplated merger, acquisition, asset sale or transfer, financing, bankruptcy or restructuring of all or part of our business.
- **Complying with legal obligations:** including to comply with the law, our legal obligations and legal process, such warrants, subpoenas, court orders, and regulatory or law enforcement requests.
- **Aggregate and de-identified information.** We may de-identify Personal Information and create anonymous and aggregated data sets and reports in order to assess, improve and develop our business, products and services, prepare benchmarking reports on our industry and for other research, marketing and analytics purposes.

## SHARING AND DISCLOSURE OF PERSONAL INFORMATION

HomeRiver Group may disclose or share the Personal Information it collects as set forth herein and/or as otherwise described at the time of collection or sharing.

- **Service providers:** We may disclose Personal Information with third-party service providers who use this information to perform services for us, such as hosting providers, auditors, advisors, consultants, and customer service and support providers.
- **Subsidiaries and Affiliates:** We may share your Personal Information with our affiliated companies (i.e., companies under common ownership, control or management with us) - use will be subject to this privacy notice.
- **Third Parties.** We may disclose Personal Information to third parties in order to operate our Sites, facilitate your requests, or with your acknowledgement and consent, including with:
  - independent real estate professionals and owners and operators of real estate brokerage companies to enable them to provide services you request through the Sites.
  - third parties to provide you a service you requested through a partnership or promotional offering made by a third party or us.
  - the public if you submit to a public part of the Sites, such as comments, social media posts, or other features viewable by the public or generally by registered users of the Sites.
  - third parties with whom you choose to let us share information, for example other apps or websites that integrate with the Sites, or those with services with which we integrate.
  - third parties we work with to provide you with more personalized content and ads, and to track the effectiveness of campaigns.
- **Business transfers:** We may disclose or transfer Personal Information as part of any actual or contemplated merger, sale, and transfer of our assets, acquisition, financing or restructuring of all or part of our business, bankruptcy or similar event, including related to due diligence conducted prior to such event where permitted by law.
- **Legally required:** We may disclose Personal Information if we are required to do so by law (e.g., to law enforcement, courts or others, e.g., in response to a subpoena or court order).
  - **Protect our rights:** We may disclose Personal Information where we believe it necessary to respond to claims asserted against us or, comply with legal process (e.g., subpoenas or warrants), enforce or administer our agreements and terms, for fraud prevention, risk assessment, investigation, and to protect the rights, property, or safety of us, our clients and customers or others.
- **Mobile Information:** SMS messaging charges may be applied by your carrier. We will not share your opt-in to an SMS campaign with any third party. No mobile information will be

shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

- **Other disclosures:** We may share your data with third parties when you consent or direct us to do so.

#### CATEGORIES OF PERSONAL INFORMATION COLLECTED AND PROCESSED

Some jurisdictions require us to disclose whether the following categories of personal data are collected, shared with third parties for a “business purpose,” “sold,” or disclosed for targeted advertising. The table below indicates the categories of personal information we collect and transfer in a variety of contexts. We do not “sell” your personal information for money.

To provide our services, we collect and process the following categories of Personal Information:

- **Identifiers**, such as your first and last name, postal address, email address, telephone number, date of birth, gender identity, age, or advertising identifiers associated with your device, which may be provided by the operating system of your device.
- **Messages, Comments, and other User-Generated Content** that you choose to provide to us voluntarily, including comments, messages, and other content you post to the Service.
- **Internet or Other Electronic Network Activity and Other Information** that are automatically obtained from the devices and/or browsers that you use to access our Services, such as information about how you use the Services, browsing history, and information about your device (i.e. the type of device, operating system, IP address, and device identifiers, such as universally unique identifiers (UUID), which are small data files or similar data structures stored on and/or associated with your mobile device that uniquely identify your mobile device).
- **Geolocation data** obtained and derived from your mobile device when you access the Service by or through such mobile device.
- **Inferences**, which may be drawn from any of the categories of personal information described above to create profile(s) reflecting your preferences, characteristics, predispositions, interests, and behavior.

We strive to minimize collection, use, processing and disclosure of your personal information to the extent that is reasonably necessary and proportionate to providing you with the Service you requested and/or as otherwise permitted and/or required by applicable laws. The above categories

of Personal Information may be disclosed for business purposes to (i) affiliates or subsidiaries; (ii) business partners; (iii) data analytics providers; (iv) internet service providers; (v) joint marketing partners; (vi) operating systems and platforms; (vii) other service providers; (viii) professional service organizations, including auditors and law firms; and (ix) advertising networks.

## COOKIES, TRACKING AND ANALYTICS

- **Cookies:** A “**Cookie**” is a small text file placed on a device when a user visits a website (including our Services). Cookies can be sessional or persistent and are not programs that download on a user’s system and damage files (such as, viruses or worms) or send information to third parties about websites visited (such as, spyware). A persistent Cookie remains on your device after you close your browser. Persistent Cookies may be used by your browser on subsequent visits to the Service. Persistent Cookies can be removed by following your browser’s directions. A sessional Cookie is temporary and disappears after you close your browser. You can set your browser to refuse certain Cookies or to indicate when a Cookie is being sent. However, some features of the Service may not function properly if the ability to accept Cookies is limited or disabled. We may send one or more cookies to your device that uniquely identifies your browser and enables us to recognize repeat visitors, facilitate a visitor’s ongoing access to and use of the website, track your usage of the Service over time and compile data that would permit content and speed of access improvements and targeted offers (e.g., the pages you view, the links you click and other actions you take on the Service), and enhance your navigation through the Service. Information (i.e., domain names and IP addresses) and data may be automatically collected through the standard operation of our internet servers at our discretion using cookies.
- **Log file information:** Log file information is automatically reported by your browser each time you access a web page or other content within the Service. We may also receive log information relating to your device and your use of our Apps. When you use the Service, our servers automatically record certain log file information (“**Server Logs**”). These Server Logs may include anonymous information such as your web request, Internet Protocol (IP) address, operating system, browser type, referring/exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information. The information contained in Server Logs is used to monitor, assess, manage, diagnose problems with, improve and otherwise administer the Service.
- **Clear gifs/web beacons information:** “**Clear Gifs**” (also known as web beacons) are used to anonymously track the online usage patterns of our users. We also may use Clear Gifs in

HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. You can disable the ability of Clear Gifs to track certain information by setting your browser to refuse certain Cookies. The information allows for more accurate reporting, monitoring and improvement of the Service.

- **Managing the collection of your information for Analytics and Advertising Purposes:** Please refer to your device's or browser's technical information for instructions on how to delete and disable Cookies, and other tracking/recording tools, including how to reset your Advertising Identifiers and limit advertising tracking. Depending on the type of device you are using to access the Service, it may not be possible to delete or disable tracking mechanisms on the device. We may use [third-party companies](#) to collect and analyze data and/or serve ads when you access and use the Service. These companies may use information about your use of the Service and other websites and mobile applications in order to provide data analysis to us or to serve advertisements about goods and services of interest to you. These companies do not use personally identifiable information (such as your name, address, email address or telephone number) when providing their services. These companies may also use non-cookie technologies to recognize your computer, browser, or mobile device and/or to collect and record information about your browsing activity, including your activities on or off the Service and between multiple platforms. If you would like more information about this practice and to know your choices about not having this information used by these companies, visit <http://networkadvertising.org/>, <https://youronlinechoices.eu> and <http://youradchoices.com>. Alternatively, you can also manage your Cookie setting on our website.

## DATA RETENTION

Your personal information will be retained for so long as reasonably necessary and proportionate for the purposes outlined in this Privacy Policy based on criteria such as duration required to provide services to you, including for backup, archival, fraud prevention or detection, or audit purposes, or as otherwise required by law. We may use remote backup features that will send information from your device and/or browser to be stored on servers operated by or on behalf of HomeRiver Group and its affiliates. Except to the extent specifically prohibited by applicable law, HomeRiver Group has no responsibility for any data transmitted to and from your device and/or computer and HomeRiver Group recommends that you make regular back-ups of all information and data on your device and/or computer.

## INDIVIDUAL RIGHTS AND CHOICES

Depending on where an individual lives/resides, they may have the following rights (please check with legal if you are unsure about specific rights and circumstances):

- **Request to Delete:** You may request the deletion of their personal information that we have collected about them and to have such personal information deleted, except where an exemption applies. We will respond to verifiable requests received from applicable residents as required by law.
- **Request to Know:** You may request and, subject to certain exemptions, receive a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance. You may make a Request to Know up to twice every 12 months. We will respond to verifiable requests received from applicable residents as required by law.
- **Request to Change:** You may request You may ask us to correct inaccurate or incomplete data. Note that we may keep historical data in our backup files as permitted by law.
- **List of Third-Party Recipients:** Some jurisdictions allow you to obtain a list of the categories of third parties to which we have disclosed personal information.
- **Opt-out of Marketing Emails:** You may opt out from receiving marketing-related communications from us on a going forward basis by contacting us or by using the unsubscribe mechanism contained in each email. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt out.
- **Opt-out of Promotional Text Messages:** If you get a text message from us that has promotional content, you can opt-out of future text messages by replying “STOP.”
- **Deactivation:** You can deactivate your account at any time by contacting us. However, you will not be able to access many of the services when you deactivate your account. Please note that even if you request deactivation of your account, it may take some time to fulfill this request.
- **Right to non-discrimination:** We do not discriminate against anyone for exercising their privacy rights.

Not all the rights above are absolute, and they do not apply in all circumstances. We may limit or deny some requests because the law permits or requires us to.

### **Submitting Requests**



You may exercise the above rights by submitting a request to us as at [dataprivacy@homeriver.com](mailto:dataprivacy@homeriver.com) or by calling us at 916-429-1205. If you disagree with our denial of a request, you may appeal our decision by emailing us with the subject line “Appeal.” We may only implement requests (a) where required by applicable law and (b) with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. In some circumstances, you may designate an authorized agent to exercise certain privacy rights on your behalf.

## 6. REFERENCES AND ADDITIONAL INFORMATION

See also:

- Employee Privacy Policy
- Privacy Policy Notice (available at [www.homeriver.com/files/privacy-policy-HomeRiver-Group.pdf](http://www.homeriver.com/files/privacy-policy-HomeRiver-Group.pdf))