

REALTYADS PRIVACY POLICY

LAST UPDATED: November 5th, 2020

RealtyAds, LLC (“RealtyAds”, “we”, “us”, or “our”) understands your concerns with regard to how information about you is used and shared, and we appreciate your trust that we will use and share information about you carefully and sensibly. This Privacy Policy (this “Policy”) applies to information about you collected in connection with your access to and use of the RealtyAds Platform and website, located at <https://www.realtyads.com/> and its associated subpages and customized landing pages (collectively, the “Platform”), as well as the associated services and features available through the Platform, including digital advertising solutions for launching and optimizing digital ad campaigns for real estate properties across major ad platforms (such as Facebook, Instagram, Google, and LinkedIn) (collectively, the “Services”). This Policy describes the information we collect about you in relation to your use of the Platform and Services, how we collect it, how we use it, with whom we may share it, and what choices you have regarding it.

Please read this Policy carefully. By clicking “accept” or otherwise accessing and using the Platform and Services, you agree that you have read and understand this Policy and that you accept and consent to the privacy practices (and any uses and disclosures of information about you) that are described in or relate to this Policy.

For purposes of clarity, this Policy applies to the <https://www.realtyads.com/> website and any customized realtyads.com landing page URLs specifically authorized under our service terms with the real estate company, business, brokerage, or other entity whose property(ies) is identified and advertised thereon (each, a “**Client**”, and such properties, the “**Properties**”). This Policy does **NOT** apply to any other websites accessed via unique and separate URLs that are operated by third parties, including any such websites operated by any of our Clients. We are not responsible for the privacy practices of our Clients or other third parties or websites. We encourage you to seek out and read the privacy policy of each website that you visit.

When do we collect your information?

RealtyAds collects information relating to you and your use of the Platform and Services in order to provide services and features that are responsive to your needs. We collect information in the following ways:

- **Directly from you.** We collect information from you when you register an account with us, submit information, data, or content to the Platform, fill out a form, complete a survey, request information, sign up for our newsletter, send us an email, text message, or other communication, speak with us on the telephone, or otherwise interact with us or the Platform or Services.
- **From our Clients and other third-party sources.** We may receive information about you from our Clients and our third-party partners and service providers who help us to provide services to you, including the Platform and Services.
- **Automatically as you navigate the Platform.** Information collected automatically as you use and navigate the Platform may include usage details, email address, IP address, and information collected through cookies and other tracking technologies.

What information do we collect?

Information you provide to us. We collect the information you provide directly to us when you access and use the Platform and Services, including, but not limited to, your:

- First and last name
- Company name and information
- E-mail address

- Phone number
- Physical Address
- Account information (including username and password)
- Contact preferences
- Geolocation data
- Messaging content and information
- Information regarding your utilization of the Platform and Services
- Any other information that you submit to or store within the Platform

Information sent to us by web browsers and devices. We and our third-party service providers collect information that is sent to us automatically by your web browser or device. This information typically includes your IP address, Internet service provider information, the name and version of your operating system, browser type, unique device identifiers and geolocation, the date and time of your visit (and the number of your visits), the pages you visit, the length of your visit, average time spent, and the websites you visit before coming to and after leaving the Platform. The information we receive may depend on your browser or device settings.

The information we receive from your web browser and/or device is not, in and of itself, personally identifiable. Generally, we use this information in the aggregate to help us improve the Platform and make it more compatible with the technology used by our visitors. However, we may combine it with other information in an attempt to identify you or we may combine it with information that does identify you. We may also review our server logs for security purposes – for example, to detect intrusions into our network – and we might share our server logs, which contain visitors’ IP addresses, with the appropriate investigative authorities who could use that information to trace and identify you.

Information automatically collected by cookies and other technologies. We use “cookies”, pixel tags, and other tracking technologies to collect information and support certain features of the Platform. Cookies are identifiers we transfer to your device that allow us to recognize your device and tell us how and when pages and features in our Platform and Services are visited and by how many people. The Platform may also use web beacons or similar technologies such as web bugs, tracking bugs, web tags, tracking pixels, and pixel tags. As an example, pixel tags are small images embedded into websites or emails that send information about your computer, tablet, phone, or other device when you visit our website, or open an email we send to you.

How do we use your information?

We process information in order to provide the Platform and Services to you and any additional services you request, as well as to respond to communications from you. The precise purposes for which your personal information is processed will be determined by the request, and by applicable laws, regulatory guidance, and professional standards.

Generally, we use the information we collect from you to:

- **Provide the Platform, Services, and any other information or services you request to you.**
- **Support the Platform and our Services and business.** For example, we may use your information to respond to inquiries and troubleshoot any issues with the Platform or Services.
- **Manage our business needs, such as operating, monitoring, analyzing, and improving the Services and the Platform’s performance and functionality.** For example, we analyze website user behavior and conduct research and analysis about the way you and other users use the Platform and Services.
- **Tailor our and our Clients’ offerings to your preferences and apparent interests.** For example, we may use your information to ensure that visitors are not repeatedly offered the same advertisements, to customize our Platform

newsletters, advertising, and webpage content based on browser type and use profile information, and to otherwise customize each visitor's experience and provide greater convenience.

- **Improve the Platform and our Services and business, and develop new products and services.**
- **Maintain our records, including, but not limited to, your opt-in and opt-out records.**
- **Market, promote, and provide other information regarding our products and services (including the Services) and/or the Properties and other offerings of our Clients (including through targeted advertising).** We may, on our own or on behalf of our Clients, use and create hashed audience lists to create targeting audiences and deliver targeted advertisements to you.
- **Conduct processing necessary to fulfill other contractual obligations for you.** For example, if you are a Client, we will use your information to fulfill your orders and process your payments, and to otherwise process, maintain, and service your account.
- **Manage risk and protect the Platform.** We use data to better protect the Platform, our Services, and you by helping to detect and prevent fraud and abuse of the Platform and Services.
- **Comply with our other contractual, legal, and regulatory obligations.** We will use your information as necessary to enforce the terms of the Platform and our Services, to address emergency situations, and to comply with our other contractual obligations and all applicable laws and regulations.
- **Carry out other purposes for which you provide your consent.** For example, we will use your information for other purposes which are disclosed to you at the time your information is collected or for purposes which can be inferred from or are obvious given the circumstances of collection.

Please see below for information about the choices you have about the ways we use your information.

Do we disclose any information to outside parties?

We do not sell, trade, or transfer your information to third parties in exchange for monetary or other valuable consideration, except in the circumstances described below.

Third-Party Service Providers and Partners

We may disclose your information to our vendors and other third-party service providers, such as website hosts, analytics providers, and payment processors, that help us support features on the Platform and provide our Services to you. Further, our online service providers may implement technologies that allow for the collection of personally identifiable information over time and across websites. We may also disclose aggregated, de-identified information, and analyses and reports derived from such information, to our service providers. These service providers are responsible for their own compliance with data protection laws.

We use Google Analytics to measure and report how users interact with the Platform, and to analyze the traffic to the Platform and for the other purposes as set forth in this Privacy Policy. For more information about Google Analytics and how it collects and processes data, please see “[How Google Uses Data When You Use Our Partners' Sites or Apps.](#)” For more information about how Google uses and shares information collected by Google Analytics through your visits to Platform, please see Google's [Terms of Service](#) and [Privacy Policy](#). If you do not want your Platform visit data reported by the Google Analytics JavaScript, you can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript to prohibit sending visit information to Google Analytics, but does not prevent information from being sent to the Platform itself or in other ways to other website analytics services. Click [here](#) if you would like to learn more about the Google Analytics opt-out browser add-on, and click [here](#) to install the opt-out browser add-on.

We may also disclose your information to our third-party social media partners (such as Facebook, Instagram, Twitter, Google, and LinkedIn) so that they may, on our or our Clients' behalf, serve and display targeted advertisements to you. We will only share your information in hashed, non-human readable form.

Our Clients

If you use, visit, or submit any information to any of our authorized Client-based realtyads.com landing page URLs, we will disclose your information (including, but not limited to, your name, contact information, company information, and message content) to our Client whose Property(ies) are advertised there.

Legal Requirements and Business Transfers

We may disclose your information: (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other government official request; (ii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss; (iii) in connection with an investigation of a complaint, security threat, or suspected or actual illegal activity; (iv) in connection with an internal audit; or (v) in the event that RealtyAds is subject to mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, your information (including personal information) may be shared, sold, or transferred, and it may be used subsequently by a third party.

What choices do you have about your information?

We offer certain choices about how we communicate with you and what information we obtain about you and share with others.

Account. If you are a Client with an account on the Platform, you can update, modify, or delete certain of your account information and preferences after you log into your account using the features and functionalities available there. You may also contact us at the email address below for assistance in updating, modifying, or deleting any of your information.

Email preferences. You may opt out from receiving future promotional or informational emails or newsletters from us by clicking on the opt-out link or otherwise following the instructions for unsubscribing in the emails and newsletters we send to you or by contacting us at the email address below. However, if you are a Client, you cannot opt out of transactional emails related to your account registration with the Platform or other transactions with us.

Text messaging opt-out. You may opt out of receiving text messages from us at any time by replying “STOP” to the last text message you received (or by following such instructions as are set out in the received text message). If you are a Client with an account on the Platform, you may also opt out of receiving text messages using the features and settings available in your account. Once your opt-out has been confirmed, you will no longer receive text messages from us.

Online advertising and marketing audience opt-out. Our clients may use hashed audience lists to create targeting audiences and deliver targeted ads. To opt out of these advertising audiences and be excluded from ads, please complete the opt out form here: <https://www.realtyads.com/data-opt-out/>. You may also visit social media sites where you are a member to explore your privacy settings and any opt out options they may provide for targeted advertising. In addition to the management tools describe above, users can manage third-party advertising preferences for some of the third-party partners we work with to serve advertising across the Internet by utilizing the choices available at http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/choices>.

Do Not Track. While we take all reasonable steps to protect the privacy of our website visitors, we cannot promise that the current limitations of our online applications programming will address every browser setting or honor every personal browser preference. In particular, we have not implemented the necessary program changes to honor “Do Not Track” or “DNT” browser signals. As our online applications programming is refined, we will take all reasonable steps to honor such requests in the future. Please return to this Policy for further updates on

this topic.

Cookies. Most web browsers automatically accept cookies, but you can change your browser’s settings to disable all or certain cookies if you wish. Please be aware that if you change the preferences on your device to prevent or limit your device’s acceptance of cookies, this may prevent you from taking advantage of some of the features on the Platform.

Location of the Platform

The Platform is hosted and operated in the United States. However, we and our service providers may store information about individuals in the United States, or we may transfer it to, and store it within, other countries.

Visitors from jurisdictions outside the United States visit us at their own choice and risk.

If you are not a resident of the United States, you acknowledge and agree that we may collect and use your personal information outside your home jurisdiction, and that we may store your personal information in the United States or elsewhere. Please note that the level of legal protection provided in the United States from which you may access the Platform may not be as stringent as that under privacy standards or the privacy laws of other countries, possibly including your home jurisdiction.

How long do we retain your information?

We will keep your information for the period necessary to fulfil the purposes described in this Policy, unless a longer retention period is permitted or required by law.

Third-party links

Occasionally, at our discretion, we may link to third-party products or services on or through the Platform or Services. These third parties have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. We urge you to read the privacy policies of other websites before submitting any information to those websites.

How do we protect your information?

RealtyAds has implemented reasonable physical, technical, and administrative security standards to protect your information from unauthorized loss, misuse, alteration, or destruction. We strive to protect your personal information against unauthorized access, use, or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information. However, no system or procedures are entirely secure or failsafe, and we do not guarantee the security of your information.

CALIFORNIA PRIVACY NOTICE

Pursuant to applicable California law, including the California Consumer Privacy Act (“CCPA”), RealtyAds makes the following disclosures regarding the personal information we collect:

<u>Category of Personal Information</u>	<u>Category of Source from which Data is Collected</u>	<u>Purpose of Collection</u>	<u>Category of Third Parties to whom Data is Disclosed</u>

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Contact information such as name, e-mail address, phone number, mailing address	Directly from users	To provide the Services, to market and promote our Clients' Properties, and to support our and our Clients' electronic and digital programs	Service Providers and our Clients
Account login information such as username, email address, password	Directly from users	To provide the Services, to market and promote our Clients' Properties, and to support our and our Clients' electronic and digital programs	Service Providers and our Clients
User preferences such as interests and activities	Directly from users	To personalize the Services according to your personal preferences and to serve and display targeted ads; for developing new goods and services, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our service promotions and operating and expanding our business activities	Service Providers and our Clients
Automatically collected information on websites such as IP address, device type, browser type	Cookies and other tracking technologies	For data analysis, audits, security and fraud monitoring and prevention; activities, events and promotions; for developing new goods and services, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our and our Clients' promotional campaigns and operating and expanding our business activities	Service Providers and our Clients

We have not sold consumers' personal information in the twelve (12) months preceding the effective date of this Privacy Policy.

If you are a California resident, pursuant to the CCPA, you have the right to request:

- the categories of personal information we have collected about you;
- the categories of sources from which your personal information is collected;
- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom we shares your personal information;
- the specific pieces of personal information we have collected about you;
- when and if applicable, the categories of personal information that we have sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt out of having your personal information disclosed or sold to third parties.

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please

contact us at ccpa@realtyads.com, (844) 203-8988, or complete the web form located at <https://www.realtyads.com/data-opt-out/>. To verify your identity when you submit a request, we will match the identifying information you provide us to the personal information we have about you. If you have an account with us, we will also verify your identity through our existing authentication practices for your account. Request will typically be honored within forty-five (45) days or less, but may take up to ninety (90) days based on the results of verification.

However, we will not be required to comply with your request to delete your personal information if it is necessary for us to maintain your personal information in order to:

- complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- debug to identify and repair errors that impair existing intended functionality;
- exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- comply with a legal obligation; or
- otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

We will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

This Policy is available to consumers with disabilities. To access this Policy in an alternative downloadable format, please click <https://www.realtyads.com/ppdl/>.

Your Nevada Privacy Rights

We do not currently sell your covered information as those terms are defined under applicable Nevada law. However, you may still submit an opt-out request and we will honor that request as required by Nevada law if we were to ever engage in such a sale in the future. If you are a Nevada resident and would like to opt-out of future sales of your covered information, please submit your request to support@realtyads.com, or by calling us at (844) 203-8988. Your request must include your full name, street address, city, state, zip code, and an email address so that we can contact you if needed regarding this request. You may also be required to take reasonable steps as we determine from time to time in order to verify your identity and/or the authenticity of the request. We

will respond to your request within sixty (60) days either confirming that your request has been processed or indicating that we need an additional thirty (30) days to complete the request.

Do we collect information from children?

The Platform and Services not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Platform or Services. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on the Platform or Services or on or through any of their features, including your name or email address. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at support@realtyads.com.

Contacting us

For any questions, or to request further information regarding this Policy, please contact us at support@realtyads.com.

Changes to this Policy

It is our policy to post any changes we make to this Policy on this page. If we make material changes to how we treat our users' information, we will notify you by e-mail to the primary e-mail address you have provided to us and/or possibly through a notice on our Platform's home page. The date this Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting the Platform and this Policy to check for any changes.