

# REAL-FINITY LLC PRIVACY POLICY

Effective Date: June 20<sup>th</sup>, 2020

This Privacy Policy describes how Real-Finity, LLC (“**Real-Finity**,” “**we**,” “**us**”) collects and processes Personal Information.

Please read this Privacy Policy carefully. When you submit information to us, you consent to the processing of your information as described in this Privacy Policy.

## 1. SCOPE

This Privacy Policy applies to public areas of [real-finity.com] and its affiliated websites (collectively, “**Sites**”) as well as subscription services available only to registered users in or to which this Privacy Policy is linked or posted (collectively with the Sites, the “**Services**”).

This Privacy Policy does not apply to information that is collected offline or by any third-party websites or services that you access through the Services. **IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, THEN PLEASE DO NOT USE THE SERVICES.**

Our right to process information also may be described in our agreements with our customers (“**Customer Agreements**”). If a provision of a Customer Agreement conflicts or otherwise is inconsistent with a provision of this Privacy Policy, then the term of the Customer Agreement will prevail to the extent of the conflict or inconsistency. This Privacy Policy will be updated to address any such conflict if it impacts you and what you have agreed to pursuant to this Privacy Policy.

In this Privacy Policy, to “**process**” Personal Information means to perform any operation on Personal Information, whether or not by automated means, such as collection, recording, organizing, storing, adapting, use, disclosure, combining, erasing or destroying.

## 2. CHANGES TO THIS PRIVACY POLICY

The Effective Date of this Privacy Policy is set forth at the top of this webpage. As we add new features to the Services, we may amend this Privacy Policy. If we make a material change to this Privacy Policy that reduces your privacy rights, we will notify you in advance through the Services. Your continued use of the Services after the Effective Date constitutes your acceptance of the amended Privacy Policy. The amended Privacy Policy supersedes all previous versions.

## 3. INFORMATION WE COLLECT

When you use the Services, we collect two types of information: Personal Information and Usage Data.

In this Privacy Policy, “**Personal Information**” means any information that identifies or could be used to identify an individual. Personal Information does not include aggregated information to the extent that an individual’s identity cannot be derived from it. Personal Information includes your contact data (name, telephone number, email address and country of residence) and certain (but not all) Usage Data.

We define “**Usage Data**” as information about an individual’s activity on or through the Services that, by itself, does not identify the individual, such as browser type, operating system and webpages visited. Generally, we do not consider Usage Data as Personal Information because

Usage Data by itself usually does not identify an individual. Usage Data may, however, be Personal Information under certain laws because it could be used to indirectly identify an individual.

We may link Personal Information and Usage Data or different types of Usage Data. We also may link publically-available Personal Information, such as Personal Information available in public databases and through social networking websites. The linked information may identify an individual person and is Personal Information.

#### **4. HOW WE COLLECT INFORMATION**

**When you Use the Services:** When you subscribe to or otherwise use the Services, we collect information about you, such as your name, property address, email address, phone number and any other information that you provide us. Such information also may be provided to us by your mortgage lender. We may from time to time conduct surveys to better understand the needs and profiles of our users. You may choose whether to participate in any survey.

We also collect information through our server logs. A server log is a list of the activities that a server performs. Real-Finity's servers automatically collect and store in server logs your search queries, Internet Protocol (IP) address, hardware settings, browser type, browser language, the date and time of your request and referral URL and certain cookies that identify your browser or Real-Finity account.

We collect information about your computer, tablet or mobile telephone ("**Device**"), such as model, operating system version, mobile network information, telephone number, internet service provider and similar identifiers. Real-Finity may associate your Device information with your Real-Finity account. We may collect and store information (including Personal Information) on your Device through browser web and web application data caches.

Real-Finity offers mobile applications ("**Apps**"). Real-Finity collects information about your use of and interaction with the App, such as your Device's operating system, browser type, domain and other system settings, search queries, the country and time zone in which your Device is located, metadata and other information stored on your Device, as permitted by your operating system settings. A Real-Finity App also may access metadata and other information associated with other files stored on your Device.

**Through Service Providers:** Third parties that assist us with our business operations also collect information through the Services. For example, service providers collect information to help us detect and prevent fraud.

**Through Data Collection Technology:** We use cookies, pixel tags (also known as web beacons, flash cookies and clear GIFs) and similar technology ("**Data Collection Technology**") to automatically collect information about you when you use the Services. Please read below to learn more about how Real-Finity uses Data Collection Technology.

#### **5. COOKIES AND OTHER DATA COLLECTION TECHNOLOGY**

Cookies are small text files that are sent to or accessed from your web browser or your computer's hard drive. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the "lifetime" of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier. A cookie also may contain information about your computer, such as user settings, browsing history and activities conducted while using the Services. A web beacon (also called a pixel tag or clear GIF) is a piece of computer code that enables us to monitor

user activity and website traffic. To learn more about cookies and web beacons, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

**How We Use Data Collection Technology:** Data Collection Technology helps us improve your experience of the Services by, for example, storing your password so you do not have to re-enter it each time you use the Services, measuring the success of marketing campaigns, compiling statistics about use of the Services and helping us analyze technical and navigational information about the Services and to detect and prevent fraud.

The Services use the following cookies:

- *Strictly necessary cookies*, which are required for the operation of the Services. Without them, for example, you would not be able to register or log in for the Services that we may offer.
- *Analytical/performance cookies*, which allow us to recognize and count the number of visitors, to learn how visitors navigate the Services and to help us to improve the way Services function.
- *Functionality cookies*, which are used to recognize you when you return to the Services.

We also use Google Analytics which is a Google service that uses Data Collection Technology to collect anonymous information about use of the Services and report website trends. Google Analytics does not identify individual users. We may use an enhancement to Google Analytics called “Demographics and Interest Reporting,” through which Google provides us with information about our users’ demographics (e.g., age, gender) and interests. This information, which Google may collect by tracking a user’s behavior across third-party websites, helps us to learn more about our users. You can learn about Google’s practices in connection with this enhanced tracking and opt out of it by visiting [www.google.com/settings/ads](http://www.google.com/settings/ads) or by downloading the Google Analytics opt-out browser add-on at <https://tools.google.com/dlpage/gaoptout>.

We also may use other Data Collection Technology to collect information from the computer or device that you use to access the Services, such as your operating system type, browser type, domain and other system settings, as well as the language your system uses and the country and time zone in which your computer or device is located.

**Your Control of Cookies:** Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your computer, tablet or mobile device. You also may be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through the Services.

**Our Policy On Do Not Track Signals:** Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a user does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain Personal Information about the browser’s user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including Real-Finity, do not respond to DNT signals.

## **6. HOW WE PROCESS PERSONAL INFORMATION**

Real-Finity processes Personal Information:

- To set up and maintain your registration with the Services;
- To communicate with you;
- To prevent and investigate fraud and other misuses of the Services;
- To protect our rights and property;
- To operate, manage, secure and improve the Services;
- To respond to your questions and to try to resolve problems with one of our products;
- To complete transactions requested by you; and
- To help us improve our customer service.

Real-Finity processes Usage Data:

- To analyze trends and gather broad aggregate demographic information;
- To statistically monitor how many people are using the Services;
- To develop, improve and protect the Services;
- For audience research;
- To audit and analyze the Services;
- To ensure the technical functionality and security of the Services; and
- To provide such information to your mortgage lender.

## 7. HOW WE SHARE INFORMATION

Real-Finity may share Personal Information collected via the Services as follows:

- **Service Providers:** We share information with our third-party service providers that help us operate the Services, such as by providing customer service or product support or testing and hardening our security measures. Real-Finity will ensure that any service provider with which we share Personal Information agrees to safeguard it in substantially the same manner as Real-Finity has described in this Privacy Policy and in accordance with all applicable laws.
- **Corporate Transaction:** We may share and transfer Personal Information if we are involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control by Real-Finity or any affiliated company (in each case, whether in whole or in part).
- **When Required by Law:** Applicable law may require Real-Finity to disclose your Personal Information if: (i) reasonably necessary to comply with legal process (such as a court order, subpoena or search warrant), government investigation or other legal requirements or (ii) necessary for the prevention or detection of crime (subject in each case to applicable law).
- **Other Lawful Disclosures:** We also share information (i) if disclosure would mitigate Real-Finity's liability in an actual or threatened lawsuit; (ii) as necessary to protect legal rights of Real-Finity, users, customers, business partners or other interested parties; (iii) to pursue available remedies or limit the damages; (iv) to enforce our agreements; (v) to respond to an emergency; and (vi) with your mortgage lender, as permitted.

Real-Finity may aggregate information collected through the Services and remove identifiers so that the information no longer identifies or can be used to identify an individual ("**Anonymized Information**"). Real-Finity shares Anonymized Information with third parties and does not limit third parties' use of the Anonymized Information.

## **8. OPTING OUT OR CORRECTING INFORMATION**

If you do not wish to receive marketing-related emails from us, please click the unsubscribe link in one of our marketing emails or email us at [support@real-finity.com](mailto:support@real-finity.com) (and include the word “unsubscribe” in your email request to us).

*To correct Personal Information about you that you believe is incorrect, please email us at [support@real-finity.com](mailto:support@real-finity.com) (and include the word “correction” in your email to us). Please note we cannot remove or correct your Personal Information in databases of third parties with which we have shared your information prior to your request. Please contact those third parties directly.*

**Notice to California Residents:** California Civil Code Section 1798.83 permits individual California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at [support@real-finity.com](mailto:support@real-finity.com).

## **9. LINKS TO OTHER WEBSITES AND SERVICES**

The Services may include links to third-party websites and services that are not operated by us. When you click these links, you will be directed away from the Services. A link to a third-party website or service does not mean that we endorse it or the quality or accuracy of information presented on it. If you decide to visit a third-party website or service, you are subject to its privacy practices and policies, not ours. This Privacy Policy does not apply to any Personal Information that you provide to these other websites and services.

## **10. NOTICE TO INTERNATIONAL VISITORS**

We are headquartered in the United States and the Services are intended for users in the United States and controlled and operated from the United States. We process and store Personal Information in the United States where privacy laws may not be as protective as in your place of residence. If you are using the Services from outside of the United States, by providing your Personal Information to us, you consent to the transfer of your Personal Information to the United States for processing consistent with this Privacy Policy.

## **11. PROTECTION OF PERSONAL INFORMATION**

We take precautions intended to help protect information that we collect and store. Unfortunately, however, no system or online transmission of data is completely secure. We cannot guarantee the security of information transmitted to or through the Services. Any transmission is at your own risk and we expect that you will use appropriate security measures to protect your information.

Users of the Services are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password-protected or secure areas of the Services. Access to the Services through your user ID and password will be treated as authorized by you. Unauthorized access to password-protected or secure areas is prohibited and may lead to criminal prosecution. We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security.

If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

## **12. CHILDREN'S PRIVACY**

The Services are not directed to or intended for use by minors. Consistent with the requirements of the U.S. Children's Online Privacy Protection Act, if we learn that we have received any

information directly from a child under age 13 without his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the Services.

**QUESTIONS OR COMMENTS**

We welcome your questions or comments. Please contact us at [support@real-finity.com](mailto:support@real-finity.com).