

PRIVACY POLICY

HomeRiver Group Holdings, LLC and our affiliate and subsidiary companies (collectively, “we,” “our,” or “us”) are committed to privacy and to transparency in our information practices. In this Privacy Policy (the “Policy”), we describe how we may collect, use, disclose, and otherwise process personal information related to our websites (each, a “Website”) and mobile applications (each, an “App”) (collectively the “Sites”) that display or link to this Policy.

Last Updated on February 1, 2025

Overview of Our Collection and Use of Personal Information	
<p>While the actual information we collect and our use of such personal information varies depending upon the nature of our relationship and interactions with an individual, the table below provides a general overview of the categories of personal information we collect and the purposes for which we use such information. Where required by law, we obtain your consent to collect certain categories of personal information. To learn more, please see the table in Section 4 below.</p>	
Categories of personal information We Collect	Use of personal information
<p>Name, contact information and other identifiers: such as name, contact information, IP address and online identifiers, Social Security number and other government identifiers.</p>	<ul style="list-style-type: none"> • <i>Providing support and services</i> • <i>Analyzing and improving our business</i> • <i>Personalizing content and experiences</i> • <i>Advertising, marketing, and promotional purposes</i> • <i>Securing and protecting our business</i> • <i>Defending our legal rights</i> • <i>Auditing, reporting, corporate governance, and internal operations</i> • <i>Complying with legal obligations</i>
<p>Customer records: paper and electronic records containing personal information, including without limitation, name, signature, photo, contact information, education and employment history, Social Security number and other government identifiers, insurance policy number, financial or payment information, medical information, or health insurance information.</p>	
<p>Protected classifications: characteristics of protected classifications under applicable state or federal law, such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.</p>	
<p>Commercial Information: including records of real property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.</p>	
<p>Usage data: internet or other electronic network activity Information including without limitation browsing history, search history, and information regarding an individual’s interaction with our Services or an advertisement.</p>	
<p>Profiles and inferences: inferences drawn from any of the above used to create a profile reflecting an individual’s preferences, behaviors or other characteristics.</p>	

Individual rights. Please see Your Rights and Choices in Section 8 below for a description of the choices we provide and the rights you have regarding your personal information. If you are a California resident, please be sure to review Section 13 below titled "Additional Information for Residents in Certain Jurisdictions" for important information about the categories of personal information we collect and disclose and your rights under California privacy laws.

1. SCOPE OF OUR PRIVACY NOTICE

This privacy notice applies to our collection, use, disclosure, and other processing of personal information related to:

- the use of our Sites that display or link to this Policy;
- former, current, and prospective clients, brokers, independent agents, and customers; and
- other individuals who use our Sites, whose personal information we receive related to the Sites, or who otherwise interact or communicate with us related to our Services

Our collection, use, disclosure, and processing of personal information about individuals will vary depending upon the circumstances. This privacy notice is intended to describe our overall privacy and data protection practices. In some cases, different or additional notices about our data collection and processing practices may be provided and apply to our processing of certain personal information

Personal information. In this privacy notice, our use of the term "personal information" includes other similar terms under applicable privacy laws—such as "personal data" and "personally identifiable information." In general, personal information includes any information that identifies, relates to, describes, or is reasonably capable of being associated, linked, or linkable with a particular individual.

Not covered by this notice. This privacy notice does not apply to current or prospective tenants, job applicants and candidates who apply for employment with us, or to our employees and non-employee workers.

2. OUR COLLECTION OF PERSONAL INFORMATION

Generally, we collect your personal information on a voluntary basis. However, if you decline to provide certain personal information that is marked mandatory, you may not be able to access certain Services or we may be unable to fully respond to your inquiry.

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 related to the use of the Sites, and in some cases, from third parties (such as social networks, platform providers, 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 or selling real estate, home search criteria, information about financing for the purchase of real estate, and other information related to the purchase or sale of 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.

3. 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.

4. DISCLOSURE OF PERSONAL INFORMATION

We may disclose the personal information that we collect about you as set forth below 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.
- **Other disclosures with your:** We may share your data with third parties when you consent or direct us to do so.

Anonymized and Aggregated Data. We may share aggregate or de-identified information with third parties for research, marketing, advertising, analytics, and other purposes. To the extent we store and use deidentified personal data, we will not try to reidentify the information, except to test our deidentification methods.

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.

Categories of Personal Information Collected Updated: December 24, 2024	Categories of Recipients Disclosed for business purposes	Categories of Recipients Shared for Targeted Advertising
Last Name, contact information and other identifiers: identifiers such as a real name, alias, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Professional services organizations, this may include auditors and law firms 	Advertising Networks
Commercial Information: including records of real property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Joint marketing partners • Other Service Providers • Professional services organizations, this may include auditors and law firms 	Advertising Networks
Usage data: internet or other electronic network activity Information including without limitation browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement.	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Professional services organizations, this may include auditors and law firms 	Advertising Networks
Profiles and inferences: Inferences drawn from any of the information identified above to create a profile reflecting a resident’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Joint marketing partners • Other Service Providers 	Advertising Networks

Cookies, Tracking, and Analytics

Our Sites may use first party and third-party cookies, pixel tags, plugins, and other tools to gather device, usage and browsing information when users visit our Sites. For instance, when you visit our Sites, our server may record your IP address (and associated location information) and others information such as the type of your internet browser, your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and

model, language, and the pages you view and links you select on the Sites, as well as date and time stamps associates with your activities on our Sites.

We use the information for security purposes, to facilitate navigation, to personalize and improve your experience while using the Sites, to improve and measure our advertising campaigns and to better reach users with relevant advertising both on our Sites and on third party websites. We also gather statistical information about use of the Sites in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them.

Cookies. Cookies are small text files that a website transfers to your hard drive to store and sometimes collect information about your usage of websites, such as time spent on the websites, pages visited, language preferences, and other anonymous traffic data. You can control the way in which cookies are used by altering your browser settings. You may refuse to accept cookies by activating the setting on your browser that allows you to reject cookies. However, if you select such a setting, this may affect the functioning of our Sites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access or log on to our Sites.

Do-Not-Track signals. Please note that our Websites do not recognize or respond to any signal which your browser might transmit through the so-called 'Do Not Track' feature your browser might have. If you wish to disable cookies on our Websites, you should not rely on any 'Do Not Track' feature your browser might have. For more information about do-not-track signals, please click [here](#).

Interest-based Advertising

On some of our Websites, we may work with third-party ad networks, analytics companies, measurement services and others (“third-party ad companies”) to display advertising on our Sites and to manage our advertising on third-party sites, mobile apps and online services. We and these third-party ad companies may use cookies, pixels tags and other tools to collect information on our Websites (and on third-party sites and services), such as browsing history, IP address, device ID, cookie and advertising IDs, and other identifiers, general location information and, with your consent, your device’s geolocation information; we and these third-party ad companies use this information to provide you more relevant ads and content and to evaluate the success of such ads and content.

5. SOCIAL FEATURES AND THIRD-PARTY PLUG INS

The Sites may integrate with social sharing features and other related tools which let you log in to the Services or share actions you take on the Services. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the social sharing service. Please refer to the privacy policies of those social sharing services for more information about how they handle the data you provide to or share through them. We do not receive or store passwords to your third-party social media accounts in this context.

6. SECURITY

We use technical, administrative, and physical controls in place to help protect Personal information from unauthorized access, use, and disclosure. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable. In the event that the security of your account has been compromised, please immediately notify us in accordance with Section 14 below (“Contact Us”). If we are required to inform you about a security incident, we will do so electronically, in writing, or by phone, as the law permits.

7. DATA RETENTION

We will retain your personal information for the period necessary to fulfill the purposes outlined in this privacy notice unless a longer retention period is required or permitted by law. We may retain personal information for longer where required by our legal and regulatory obligations, professional indemnity obligations, or where we believe it is necessary to establish, defend or protect our legal rights and interests or those of others. With respect to the data and files we handle as a processor, we retain this personal information in accordance with our clients’ instructions.

8. YOUR RIGHTS AND CHOICES

Depending on where you reside, you may have the following rights:

- 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. You can find that information in the table above under Section 4.
- 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 at the email address

at the bottom of this page. However, you will not be able to access many of the services to 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 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.

9. CHILDREN

The Sites are not intended or directed to children under the age of 16, and we do not knowingly collect any personal information, or knowingly track the use of our Services, from children. If we have actual knowledge that personal information about a child under 16 years old has been collected, then we will take appropriate steps to try and delete such personal information.

10. THIRD-PARTY WEBSITES

The Sites may contain links to third-party services. We do not own, operate, or control the websites of third-parties, including those of independently owned and operated franchisees. Accordingly, this Policy does not apply to any services maintained or operated by third-parties. When you click on those links, you will go to a third-party website where you will be subject to that service's privacy policy or similar statement and terms of use, and we encourage you to read that policy statement. We are not responsible for the privacy practices of other services, and we expressly disclaim any liability for their actions, including actions related to the use and disclosure of personal information by those third parties.

11. CHANGES TO THIS POLICY

We may amend this Policy at any time. If we make any material change in how we collect, use, disclose, or otherwise process personal information, we will prominently post a notice regarding such change on the Services. Any material changes to this Policy will be effective 10 days after our posting of the updated Policy or as otherwise required by applicable law. Where required to do so by law, we may seek your prior

consent to any material changes we make to this Policy.

12. CONTACT US

If you have any questions or concerns about this Policy, or if you need to access this Policy in a different form due to a disability, please use the following contact information:

Email: dataprivacy@homeriver.com
Mailing address: HomeRiver Group Sacramento Attn: Data Privacy
1321 Howe Avenue, #101
Sacramento, CA 95825
Phone #: (916) 429-1205

13. RIGHTS UNDER CALIFORNIA SHINE THE LIGHT LAW

- California residents may request from businesses with whom they have an established business relationship (1) a list of categories of personal information , such as name, address, e-mail address, and the type of services provided to the customer, that a business has disclosed to third parties during the immediately preceding calendar year for the third parties' direct marketing purposes and (2) the names and addresses of all such third parties. To request the above information please contact us by writing to us under the "Contact Us" section above.