Realeflow, LLC Privacy Policy - August 2, 2022

What Does this Privacy Policy Do?

This Privacy Policy describes how Realeflow collects, uses, and discloses Personal Information.

What Is Personal Information?

Personal Information is information that identifies a specific person. Personal Information also is information that could be used to identify a specific person, or that relates to, describes, or could be linked to a specific person or household.

Does this Privacy Policy Apply to You?

This Privacy Policy applies to Personal Information of visitors to our website (Website), users (Users) of our real estate investing software and related services (Services), and other individuals whose Personal Information comes into our control.

If you do not agree with the terms of this Privacy Policy, do not use our Website or Services.

What Personal Information Does Realeflow Collect?

Information You Provide

Realeflow receives Personal Information directly from website visitors (Visitors) and Users when they provide Personal Information directly to us by, among other things, setting up an account, using our Services, contacting us with questions, registering for a webinar or training, filling out a survey, or engaging us through social media.

Information We Collect Automatically

When you contact us, visit our Website, engage with us on social media, or use our Services, we collect information about you automatically, such as information about how long you spend on our Website, what Services you use, the type of computer you use, your IP address, and other similar information.

Information from Publicly Available Sources

We collect information from publicly available sources, such as property tax records. We treat publicly available information as Personal Information only when the publicly available information is combined with Personal Information obtained from non-public sources or when otherwise required under a specific law or regulation.

<u>Information from Third Party Data Providers</u>

Realeflow receives Personal Information from third party data providers for purposes such as helping us correct or supplement our own records, improve the quality of our services and marketing, provide property leads to our Users, and to detect or prevent fraud.

User Collected Personal Information

Users of our Services input User Collected Personal Information (UCPI) about other individuals, such as homeowners and business partners. Realeflow has the right to use this UCPI for its own business purposes according to the terms of this Privacy Policy and Realeflow's agreements with its Users, but does not have the right to honor individual requests not to sell or to access or delete this information to the extent it is contained in our Users' accounts and under their control.

What Categories of Personal Information Does Realeflow Collect?

We collect the following categories of Personal Information from the sources described above:

- Identifiers, such as your name, postal address, user name, internet protocol address, email address, and other similar identifiers.
- Customer records information, such as name, address, telephone number, payment card information (if you are a user of our Services), home ownership, and residence status.
- Commercial information, such as Services considered or purchased by Users and payment records.
- Internet or other electronic network activity information, such as browsing history, location information, and information regarding interaction with our Website, Services, and advertisements.
- Location information, including general location (based on IP address or other similar information sources) and, if you provide permission, precise GPS location.
- Inferences drawn from Personal Information to create a profile about an individual reflecting the individual's preferences, characteristics, behavior, attitudes, abilities, and aptitudes.

How Does Realeflow Use Personal Information?

Realeflow uses Personal Information to operate its business, including:

• to provide the Services to Users

- to respond to questions from Users, Website Visitors, and other prospective Users
- to communicate with you about relevant products and services
- to market our Services
- to improve our Services and develop new Services
- to detect, protect against, and report security incidents and illegal activity
- to comply with legal obligations
- for our internal business purposes

When Does Realeflow Disclose Personal Information?

Realeflow will disclose Personal Information when:

- requested by you
- requested by our Users
- requested by companies that offer our Services under their own names ("White Label Providers")
- necessary to provide the Services
- to prevent fraud, abuse, and violations of laws
- necessary for our internal business purposes
- marketing Services
- communicating with you
- required by law, and
- related to the sale of all or part of our business

To Whom Has Realeflow Disclosed Personal Information in the Past 12 Months?

In the last 12 months, Realeflow has disclosed Personal Information for a business purpose to the following categories of third parties:

- <u>Service Providers</u>. We share Personal Information with service providers that support our business activities, such as direct mail vendors, payment card processors, and other third parties that help us provide or improve our products and services.
- <u>Providers of Co-Branded and Ancillary Products and Services</u>. From time to time, we allow other
 businesses, entities, and individuals ("Affiliates") to make their products and services available
 within our Services, some of which may be co-branded. In some cases, we have provided Personal
 Information to these Affiliates in connection with their offering of ancillary products and services
 within our Services.
- Advertising and Marketing Companies. We share Personal Information (such as device identifier, type of device, IP address, cookies and other information associated with your Website and Services usage with publishers, advertisers, and measurement analytics providers) engaged in third-party advertising and marketing.

Does Realeflow Disclose Personal Information to Third Parties for Marketing Purposes?

Yes. Realeflow discloses Personal Information to third parties, such as advertising networks, for Realeflow's marketing purposes. For example, if you visit our Website, that information may be provided to our advertising network partners so that they can display ads for our services on other websites not controlled by Realeflow.

Does Realeflow Sell Personal Information?

Yes. Realeflow sells Personal Information to Users of the Services and businesses who offer services that may be of interest to our Users and who request such information. For example, we provide our Users with leads on prospective investment properties, including (in some cases) contact information for the owners of those properties.

Does Realeflow Use Cookies, Web Beacons, or other Similar Tools?

Realeflow uses various tools, such as cookies and web beacons, to collect information regarding visits to our Website and use of our Services. We use these tools to improve, customize, and market our Services.

Cookies are small data files stored by your Internet browser that record and store information about your visit and interaction with our Website and Services. Some of these cookies are one-time "session" cookies that do not store information after you leave our site. Other cookies are "persistent" cookies that remain on your computer and store information about each visit you make to our Website and use of our Services.

Web beacons (sometimes called single-pixel gifs) collect information about which portions of our website you visit and which Services you use).

At any time, you may adjust your browser settings to delete existing cookies or refuse new cookies. If you delete cookies, you may need to log in again and re-enter preferences you previously set. If you refuse cookies, some features of our website and Services may not perform properly.

Realeflow also uses certain tracking tools provided by Google (e.g., Google Analytics) and Facebook. We encourage you to review Google's (https://policies.google.com/) and Facebook's (https://www.facebook.com/privacy/policy) privacy policies for a description of how these tools work, what information is collected by these tools, and how these companies use information from these tools.

Your browser may offer a "Do Not Track" option. Our website and Services do not support "Do Not Track" requests.

How Long Does Realeflow Retain Personal Information?

Realeflow retains Personal Information as long as needed for legal purposes, current business operations, and reasonably anticipated future uses related to the original purpose for which the information was first acquired. For example, when you cancel your Realeflow account, we may retain information from your account so that we can re-activate your account in the future upon your request.

How Can I Opt Out of Marketing Calls, Texts, Email Messages, and Direct Mail?

Realeflow uses Personal Information to offer Services by phone, text message, email, and direct mail. Receiving promotional messages from Realeflow is voluntary and you may opt out at any time.

To opt out of marketing text messages, you can text STOP to any message you receive from Realeflow. You may receive a final text message confirming your opt out.

You can unsubscribe from Realeflow promotional emails at any time by clicking on the unsubscribe link included at the bottom of our email messages.

You can also opt out of phone calls, text messages, emails, and direct mail by contacting Realeflow at (855) 545-2095, by filling out a form on our website by <u>clicking here</u> or emailing us at <u>privacy@realeflow.com</u>.

Please allow up to 30 business days from receipt for Realeflow to process any unsubscribe request.

Please note that even if you opt out of marketing communications, you may still receive non-promotional communications from us, including service announcements, administrative messages, or other communications necessary to provide Services to you. You cannot opt out of receiving these non-marketing communications if you are using the Services.

How Does Realeflow Protect My Personal Information?

We maintain industry-standard physical, electronic, and procedural safeguards to protect against the loss, misuse, and alteration of Personal Information under our control. However, no method of transmitting information over the Internet or storage of information on systems connected to the Internet is 100% secure. Thus, we do not guarantee the protection of any Personal Information we receive.

If you create an account for using our Services, you will be asked to choose a password to protect your account. For your security, do not share your password with any other person or allow any other person to use your account. You are responsible for maintaining the confidentiality of your password and account and are fully responsible for all use of your account.

What Is Realeflow's Policy on Links to Third Party Websites?

Our Website and Services contain links to third-party websites and services, either directly or through advertisements. Realeflow does not control these third-party services and is not responsible for the content or privacy practices of any third-parties. We encourage you to review the privacy policies and terms of service used by third-parties before using their services or providing any information to them.

Does this Policy Apply to Users' and White Label Providers' Handling of Personal Information?

No. Realeflow Users and companies that market and sell Realeflow services under their own names ("White Label Providers") are not governed by this Privacy Policy except as expressly noted below.

Users of our Services (Users) have the ability to collect, disclose, and use Personal Information of third parties when using our Services. This Policy does not apply to our Users' collection, use, and disclosure of Personal Information. However, each User of our Services is required to accept our Terms of Service, which expressly limits Users from using Personal Information obtained from us (including Personal Information within our Services) for other purposes.

White Label Providers have access to Personal Information collected by Realeflow. White Label Providers are contractually prohibited from using Realeflow Services (and Personal Information provided by Realeflow) in ways that violate any applicable law, regulation, or contract (including Realeflow's contract with the White Label Provider). White Label Providers also are required to have and enforce their own Privacy Policies.

Does Realeflow Collect Personal Information of Children?

Realeflow Services are not intended for use by anyone under the age of 18. Realeflow does not knowingly collect or store Personal Information of any person under the age of 18. If we learn that we have collected Personal Information of a person under the age of 18, we will make commercially reasonable efforts to delete such information promptly.

What Law Applies to this Policy?

Our Website and Services are hosted and performed in the United States of America. This Privacy Policy is governed by the laws of the United States and the State of Ohio, without regard to conflict of laws principles.

The laws governing Personal Information can vary depending on the state in which you reside. If we have information indicating the state in which you reside, we will follow the laws of that jurisdiction to the extent they apply to our processing of your Personal Information.

What Other Rights Do I have Relating to Personal Information?

Realeflow provides the following rights to all individuals whose Personal Information we collect:

- the right to opt out of the sale of your Personal Information
- the right to access your Personal Information
- the right to delete your Personal Information

Right to Opt Out of the Sale of Personal Information:

You have the right to opt out of the sale of your Personal Information. To opt out of the sale of your Personal Information, you may <u>click here</u> or on the "Do Not Sell My Personal Information" link located on our Website.

Right to Access Your Personal Information

You have the right to request that Realeflow disclose information to you about our collection and use of your Personal Information over the past 12 months, including a description of your Personal Information that was collected, used, disclosed, and sold by Realeflow.

Right to Delete Your Personal Information

You have the right to request that Realeflow delete Personal Information we collect from you, subject to certain exceptions provided by law or contract.

How to Exercise Your Access, Correction, and Deletion Rights

If you use our Services, you may access and change some personal information through your account profile, including your name, address, telephone number, and email address.

To exercise your access, correction, and deletion rights concerning your Personal Information, you also may submit a verifiable request by:

- Calling us toll-free at 1-855-545-2095
- Clicking here

We cannot respond to your request or provide Personal Information about you if we cannot verify your identity or if your request does not contain sufficient detail to allow us to understand and respond to it. To make a verifiable consumer request, you must provide your name, mailing address, and email address. We will contact you if we need additional information to verify your request.

We will use reasonable efforts to respond to your request within 45 days of receipt. We will not charge you a fee for making a request unless it is excessive, repetitive, or unfounded. If we determine your request requires a fee, we will notify you of the fee before completing the request.

You may also use an agent to make an access or deletion request. To make a request on behalf of a consumer, the authorized agent must provide Realeflow with a copy of the consumer's written and signed authorization by emailing the information to us at privacy@realeflow.com. In certain circumstances, we may also require verification of the consumer's identity.

Does Realeflow Discriminate against Consumers for Exercising Their Rights?

We do not discriminate against consumers for exercising their rights relating to Personal Information. In certain cases, however, we may be unable to offer you specific Services if you do not provide us with Personal Information necessary for your use of those Services.

California Shine the Light Law

If you are a California resident and have an established business relationship with us, you can request a notice disclosing the categories of personal information we have shared with third parties, for the third parties' direct marketing purposes, during the preceding calendar year.

To request a notice, please submit your request to

Realeflow Attn: Privacy and Legal 150 Pearl Rd. Brunswick, OH 44212

Please allow 30 days for a response.

Although our Services are not intended for use by any person under the age of 18, If you are a California resident under 18 years old, you can request that we remove content or information that you have posted to our website or other online services. Note that fulfilment of the request may not ensure complete or comprehensive removal if information has been posted to a User account and not shared with Realeflow.

To request removal of content or information, please call the privacy information line at 1-855-545-2095 or click on this link.

Nevada Residents

Nevada residents have the right to request that a company not sell their personal information for monetary consideration to certain third parties. If you are a Nevada resident and wish to exercise this right, please submit your request by clicking on the following link.

Will Realeflow Change this Policy?

We may update this Privacy Policy if our practices and Services change. In those cases, we will provide notice on our Website. If we have your email address, we will also send you an email providing notice of the change. Any change will be effective 30 days after we provide Notice, unless a shorter time is specified in the notice.

What If I have Questions?

If you have questions about this Privacy Policy, please contact us by email at privacy@realeflow.com, by phone at 1-855-545-2095, or mail at

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