Privacy Policy

LAST UPDATED: [10/11/19]

Reinform, Inc. d/b/a Structurely ("*Structurely*", "*we*", "*our*", and "*us*") respects your concerns about privacy and personal data protection and we value our relationship with you. This Privacy Policy (this "*Policy*") applies solely to personal information collected through <u>www.structurely.com</u> and text message/live chat conversations between you and our realtor customers (the "*Site*"), whether accessed via computer, mobile device or other device.

This Policy describes the types of personal information we collect through the Site and how that personal information may be used and/or with whom it may be shared. This Policy also describes how you can reach us to update your personal information, access and control the use of the personal information, or get answers to questions you may have about our privacy practices at this Site. Please read this Policy carefully, because by accessing and using this Site you are acknowledging that you understand and agree to the terms of this Policy.

This Privacy Policy does not apply to any websites operated by third parties. We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of other companies or other websites. We encourage you to seek out and read the privacy policy of each website that you visit.

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How do we collect your information?

Structurely collects information relating to you and your use of the Site in order to provide services and features that are responsive to your needs. Structurely collects personal information in the following ways:

- From you. We collect information from you when you register an account with us, utilize our text message/live chat service, request information, send us email, send us postal mail, speak with us on the telephone, or otherwise interact with us.
- From other third party sources. We may receive information about you from our thirdparty service providers who help us to provide services to you, including our Site.
- Automatically as you navigate the Site. Information collected automatically may include usage details, email address, IP addresses, and information collected through cookies and other tracking technologies.

What information do we collect?

Information You Manually Provide. Structurely collects the information you manually provide in text message/live chat conversations with our realtor customers or when you otherwise use the Site, including but not limited to:

- Name
- Telephone number
- Email address
- Home preferences
- Credit score
- Income
- Financial information
- Veteran status
- Mortgage pre-qualification information

Information Sent to Us by Your Web Browser. We collect information that is sent to us automatically by your web browser or mobile device. This information typically includes your IP address, the identity of your Internet service provider, the name and version of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. 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 Site 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 Collected by Cookies and Other Technologies. We use tracking technologies to collect information and support certain features of the Site, including cookies, web beacons, and pixels. We may use cookies and other tracking technologies to:

- collect information about the ways visitors use this Site—which pages they visit, which links they use, and how long they stay on each page;
- support the features and functionality of this Site—for example, to save you the trouble of re-entering information already in our database or to prompt the settings you established on previous visits;
- personalize your experience when you use the Site; and
- improve our marketing efforts, including through use of targeted advertising.

How do we use your personal information?

We process personal information in order to provide services to you and 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.

We use information we collect from you and information that we collect automatically to manage and improve our Site and our business. We take steps to ensure that your rights are safeguarded.

Generally, we use the personal information we collect through this Site:

- to provide the information and services you request;
- to better understand your needs and interests pertaining to your home search;
- to provide you with a personalized experience when you use the Site;
- to provide you with effective customer service;
- to improve the content, functionality and usability of the Site;
- to contact you with information and notices related to your use of the Site;
- to contact you with special offers and other information we believe will be of interest to you (in accordance with any preferences you have expressed to us);
- to invite you to participate in surveys and provide feedback to us (in accordance with any preferences you have expressed to us);
- to improve our services;
- to improve our marketing and promotional efforts; and
- for any other purpose identified in any other agreement between you and us.

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

Do we disclose any information to outside parties?

We do not sell, trade, or transfer your personal information to third parties, except in the circumstances described below.

Our Realtor Customers

Our realtor customers have full access to the information you provide through our live chat/text message feature. To understand how our customers are using your personal data, please refer to our client's own privacy policies. We have no responsibility or liability for the activities of our clients.

Third-Party Service Providers

We may disclose your personal information to our vendors and other third-party service providers, such as website hosts, that help us provide services and support features on our Site.

Legal Requirements and Business Transfers

We may disclose personal 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 requests, (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 Structurely 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, 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 personal information?

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

In General. We respect your right to make choices about the ways we collect, use, and disclose your information. In addition, we may ask you to indicate your choices at the time and on the page where you provide your information. For example, we may give you choice about the types of email communications you receive from us.

Email preferences. You cannot opt out of transactional emails related to your registration with the Site. However, you can opt out of promotional emails we send you. If you wish to stop receiving promotional emails, simply select "unsubscribe" located at the bottom of each communication.

Do Not Track. Because there currently is not an industry or legal standard for recognizing or honoring Do Not Track ("DNT") signals, we do not respond to them at this time.

Previously Expressed Preferences. You may change previously expressed preferences regarding how we use your information. If at any time you wish to be taken off our mailing lists, please contact us using the information provided above. Please provide your full name, postal address, and e-mail address so that we can find you on our mailing lists. Once we have the information we need, we will remove you from our mailing lists as you have requested. Please give us a reasonable amount of time to honor your request.

Cookies.

We provide a variety of services on our services using cookies. We place cookies on your device in order to provide you with personalized access to essential services, enhance functionality, and to show you offers and services tailored to your interests.

A cookie is a small piece of data that a website can send to your browser, which may then be stored on your hard drive as a "tag" that identifies your computer. Cookies help to navigate from page to page on a website, provide secure connections, gather statistics about the usage and effectiveness of our site, and remembers preferences from a previous visit, when you return.

We use third-party services for analytics and interest-based advertising purposes. These service providers and ad partners may use cookies alone or in conjunction with unique identifiers, beacons, and other tracking technologies to collect information about you when you use our Site, open our emails, or interact with our ads. We do not combine the information collected through the use of these services with information that directly identifies you.

Most web browsers automatically accept cookies, but you can change your browser's settings to disable all or certain cookies if you wish. Please note that by disabling or deleting cookies, you may not be able to access the full functionality of our Site. Disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set.

Location of our Site

This Site 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 our Site 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 personal information?

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

Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our Site. These third party sites 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?

Structurely has implemented reasonable physical, technical, and administrative security standards to protect personal information from 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.

Your California privacy rights

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

Category of Personal Information	<u>Category of</u> Source from	<u>Purpose of</u> Collection	<u>Category of Third</u> Parties to Whom
	Which Data is		Data is Disclosed
	Collected		
Name, telephone number, e-mail	Website and text	To nurture online	Our realtor customers
address, home preferences, credit	message/live chat	leads for the sale of	and third-party service
score, income, financial information,	conversations with	homes	providers, such as
veteran status, mortgage pre-	our realtor		website hosts
qualification information	customers		

Structurely has 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 California Consumer Protection Act (CCPA), you have the right to request:

- the categories of personal information Structurely has 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 Structurely shares your personal information;
- the specific pieces of personal information Structurely has collected about you;
- the categories of personal information that Structurely has 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, please contact us at <u>info@structurely.com</u>.

However, Structurely will not be required to comply with your request to delete your personal information if it is necessary for Structurely 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 Structurely's ongoing business relationship with you, or otherwise perform a contract between you and Structurely;
- 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 Structurely's 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 the Structurely;
- 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.

Structurely 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.

Do we collect information from children?

Our Site is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Site. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on the Site or on or through any of its features, including your name or email address. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at info@structurely.com.

Pursuant to CCPA, we will not sell the personal information of any consumer less than 16 years of age, unless the consumer, in the case of consumers between 13 and 16 years of age, or the consumer's parent or guardian, in the case of consumers who are less than 13 years of age, has affirmatively authorized the sale of the consumer's personal information.

Contacting us

For any questions, or to request further information regarding this Privacy Policy, please contact us at

Reinform, Inc. d/b/a Structurely 2712 Stange Road Ames, Iowa 50010 info@structurely.com

Changes to our privacy policy

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users' personal 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 Site's home page. The date the Privacy 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 our Site and this Privacy Policy to check for any changes.