

## PRIVACY POLICY

Citiscap Real Estate Holdings LLC, a New York Limited Liability Company (the “**Company**”) respects your privacy and is committed to protecting it through this privacy policy (the “**policy**”). This policy describes the types of information the Company may collect from you or that you may provide when you visit their mobile application (“**Mobile Application**” or “**Services**”) and the Company’s practices for collecting, using, keeping, protecting, and disclosing that information.

This policy applies to information the Company collects:

- On the Services
- In email, text, and other electronic messages between you and the Company.
- When you interact with the Company’s advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.
- When you interact with the Services through third-party platforms.

The policy does NOT apply to information collected by:

- The Company offline or through any other means, including on any other website operated by the Company or any third party (including the Company’s affiliates and subsidiaries); or
- Any third party (including the Company’s affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from (or on) the Services.

**Important:** Please read this policy carefully to understand the Company’s policies and practices regarding your information and how the Company will treat it. If you do not agree with the Company’s policies and practices, you should not to use the Services. **By accessing or using the Services, you agree to this policy and consent to the Company’s collection, use, disclosure, retention, and protection of your personal information as described in this policy.** The Company may change this policy on one or more occasions. The Company will consider your continued use of the Services after the Company makes changes as your acceptance of the changes, so please check this policy frequently for updates.

### 1. **MINORS**

The Services are not intended for anyone under 18-years old. You will only access the Services or register for an account if (1) you are at least 18-years old and (2) have reached

the age of majority where you live. The Company prohibits all persons who do not meet the age requirements from accessing the Services. Minors must not access the Services.

The Company does not collect or solicit any information from anyone under 18-years old or allow people under 18-years old to register for the Services. The Services and its content are not directed at children under 18-years old. In the event that the Company learns that it has collected personal information from a child under 18-years old, the Company will delete that information as quickly as possible. If you believe that the Company might have any information from or about a child under 18-years old, please contact the Company at [info@citiscapeapp.com](mailto:info@citiscapeapp.com).

**Section 230 Notice:** In accordance with 47 U.S.C. § 230(d), you are notified that parental control protections (including computer hardware, software, or filtering services) are commercially available that may assist in limiting access to material that is harmful to minors. You may find information about providers of these protections on the Internet by searching “parental control protection” or similar terms.

**CYBERSitter™ | Net Nanny® | CyberPatrol | ASACP.**

## 2. DISCRIMINATION

By using the Services, you’re agreeing to this policy and our Terms of Use.

You cannot discriminate based upon:

- Race
- Color
- Ethnicity
- National origin
- Religion
- Gender
- Gender identity
- Sexual orientation
- Disability
- Any other characteristic protected under applicable law

It is your responsibility as a user of the Services to know your local laws and any other legal regulations on discrimination that might apply to you.

Whether you are a user or member, discrimination is not allowed. Examples of prohibited behavior include, but are not limited to:

- Refusal of service based on membership in one or more protected group
- Derogatory or demeaning remarks against protected groups listed above
- Racial slurs
- Posts that support or glorify current or historical hate groups

If you think discrimination has occurred on the Services, please report it by emailing [info@citiscapeapp.com](mailto:info@citiscapeapp.com) and we will investigate.

### 3. PAYMENT POLICY

The Company allows its users to use various forms of payments on the Services. Users (individuals using the site or mobile application for its services) and/or Members (individuals with profiles on the Services) can pay with and accept payment by credit card, debit card, some bank transfer services, and PayPal.

**Payment.** Company allows Members to (a) accept payment by authorized credit and debit card transactions, some bank transfers services, PayPal, Zelle, transactions using Apple Pay, and transactions using Android Pay, (b) have those funds credited to a member's payment account, and (c) have those funds deposited into a member's designated bank account. The Company may share your personal or transactional information with those third-party service providers when it's necessary to process payments.

If Users and/or Members have insufficient funds in their bank accounts when their payments are being processed, the Company reserves the right to contact them directly and seek payment.

**Personal Information.** Members must provide accurate personal information as requested during registration, and are responsible for maintaining and updating that information as necessary. Members will not impersonate any person or use a name he or she is not legally authorized to use. Members authorize the Company, and authorized agents, to verify the their information (including any updated information) by accessing public records and obtaining credit reports about the Members in order to approve a payment account. Members also authorize the Company to verify the Members information from time to time while the Members are using the Services.

**Chargeback.** In the event that a user submits a chargeback, the Company reserves the right to recoup funds associated with user chargebacks from Member's account.

**Fraud Protection.** The Company reserves the right to decline transactions that we believe to be high risk, fraudulent, or in violation of Company's Terms of Use.

This Privacy Policy does not apply to the third-party online/mobile store from which you install the Mobile Application or make payments (i.e. iTunes). Company is not responsible for any of the data collected by any such third party. Company encourages you to review the third party privacy policy and contact them directly for responses to your questions.

#### 4. INFORMATIN COLLECTED

The Company may collect several types of information from and about users of the Services, including information:

- By which you may be personally identified, including your first name, last name, screenname, email address, date of birth, or any other information that the Company collects that is defined as personal or personally identifiable information under law (“**personal information**”);
- Other personally identifiable information that you voluntarily give to Company when choosing to participate in various activities related to the Application, such as chat, posting messages in comment sections or in our forums, liking posts, sending feedback, and responding to surveys.
- That is about you but individually does not identify you, including your age, location, or any other optional information you provide about yourself; or
- About your Internet connection, the equipment you use to access the Services, and usage details.
- Information Company’s servers automatically collect when you access the Application, such as your native actions that are integral to the Application, including liking, re-blogging, or replying to a post, as well as other interactions with the Application and other users via server log files.

The Company may collect this information:

- Directly from you when you provide it to the Company.
- Automatically as you navigate through the Services. Information collected automatically may include usage details, IP addresses, and information collected through other tracking technologies.
- From third parties, for example, the Company’s business partners.

##### Location Information

Company may request access or permission to and track location-based information from your mobile device, either continuously or while you are using the Application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device’s settings.

##### Mobile Device Access

Company may request access or permission to certain features from your mobile device, including your mobile device’s [bluetooth, calendar, camera, contacts, microphone, reminders, sensors, SMS messages, social media accounts, storage,] and other features. If you wish to change our access or permissions, you may do so in your device’s settings.

## Information You Provide to the Company

The information the Company collects on or through the Services may include:

- Information that you provide by filing in forms on the Services. This includes information provided at the time of registering to use the Services, purchasing subscriptions, creating a profile (if available), or requesting further services. The Company may also ask you for information when you report a problem with the Services or a service.
- Records and copies of your correspondence (including email addresses), if you contact the Company.
- Your responses to surveys that the Company might ask you to complete for research purposes.
- Details of transactions you carry out through the Services and of the fulfillment of your requests. You may be required to provide financial information before placing an order through the Services or receiving payments from the Company. Please note that the Company itself does not process credit cards, and the Company does not collect or store complete credit card information. The Company relies on trusted third-party payment processors, providers, and gateways to process transactions for the Services. The Company does not have access to your complete credit card information.
- Your search queries on the Services.

You also may provide information to be published or displayed ("**posted**") on public areas of the Services, or transmitted to other users of the Services or third parties (collectively, "**user contributions**"). Your user contributions are posted on the Services and transmitted to others at your own risk. Although you may be able to set certain privacy settings for this information by logging into your account, please be aware that no security measures are perfect or impenetrable. The Company cannot control the actions of other users of the Services with whom you may choose to share your user contributions. Thus, the Company cannot and does not guarantee that your user contributions will not be viewed by unauthorized persons.

## ***Information the Company Collects through Automatic Data Collection Technologies***

As you navigate through and interact with the Services, the Company may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to the Services, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Services.
- Information about your mobile device and Internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.

The Company also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information the Company collects automatically is statistical data and does not include personal information, but the Company may keep it or associate it with personal information the Company collects in other ways or receives from third parties. It helps the Company to improve the Services and to deliver a better and more personalized service, including by allowing the Company to:

- Estimate the Services audience size and usage patterns.
- Store information about your preferences, thus allowing the Company to customize the Services according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the Services.

The technologies the Company uses for this automatic data collection may include:

#### **Cookies and Web Beacons**

Company may use cookies, web beacons, tracking pixels, and other tracking technologies on the Mobile Application to help customize the Mobile Application and improve user experience. When you access the Mobile Application, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Mobile Application. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

The Company does not collect personal information automatically, but it may tie this information to personal information about you that the Company collects from other sources or you provide to the Company.

#### ***Third-party Use of Cookies and Other Tracking Technologies***

Third parties, including advertisers, ad networks and servers, content providers and application providers, serve some content or applications on the Services. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the Services. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other

online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

The Company does not control third-party tracking technologies or how third parties' use them. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### ***Social Networks and Third-Party Plugins***

The Services may include plugins from social networks and other third parties. An example of a plugin is the Facebook® "Like" button. Where legally permitted, these plugins may communicate with and send information to the party that provided the plugin, even if you do not click on the plugin. This information may include your IP address, information about your browser and device, and the address of the webpage you are visiting on the Services. Loading, using, or clicking the plugins may also place, read, and transmit cookies. These cookies may contain a unique identifier the social network or third party assigns you. The loading, functionality, and your use of the plugins are governed by the privacy policy and terms of the party that provided the plugin.

## **5. INFORMATION USAGE**

The Company may use the information that it collects for any of the following purposes:

- To provide, operate, maintain, improve, and promote the Services.
- To enable you to access and use the Services.
- To process and complete transactions, and send you related information, including purchase confirmations and invoices.
- To send transactional messages, including responding to your comments, questions, and requests; providing customer service and support; and sending you technical notices, updates, security alerts, and support and administrative messages.
- To send promotional communications, such as providing you with information about services, features, newsletters, offers, promotions, contests, and events.
- To monitor and analyze trends, usage, and activities in connection with the Services and for marketing or advertising purposes.
- To investigate and prevent fraudulent transactions, unauthorized access to the Services, and other illegal activities.
- To personalize the Services content, features, or advertisements.

The Company may also use your information to contact you about the Company's own and third parties' goods and services that may be of interest to you. If you do not want the Company to use your information in this way, please send the Company an email at [info@citiscapapp.com](mailto:info@citiscapapp.com) or log into your account and adjust your email preferences. For more

information, see ***what choices do you have about how the Company uses and discloses your information.***

The Company may use the information it has collected from you to allow the Company to display advertisements to its advertisers' target audiences. Even though the Company does not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

## **6. DISTRIBUTION OF INFORMATION**

The Company may disclose aggregated information about its users, and information that does not identify any individual, without restriction.

The Company may disclose personal information that it collects or you provide as described in this policy:

- To the Company's subsidiaries and affiliates.
- To contractors, service providers, and other third parties the Company uses to support its business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which the Company discloses it to them.
- To payment-service providers to (a) process payments; (b) prevent, detect, and investigate fraud or other prohibited activities; (c) facilitate dispute resolution such as chargebacks or refunds; and (d) for other purposes associated with the acceptance of credit or debit cards. The Company may share your credit or debit card number with payment service providers or card networks to monitor card transactions at participating merchants and track redemption activity for the purposes of providing card-linked services.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about the Services users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. The Company contractually requires these third parties to keep personal information confidential and use it only for the purposes for which the Company discloses it to them.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by the Company when you provide the information.



The Company may also disclose your personal information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To enforce or apply the Terms of Service and other agreements, including for billing and collection purposes.
- If the Company believes disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, its customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

If the ownership or control of all or part of the Services changes, Company may transfer your information to the new owner.

## **7. CONTROL OVER COMPANY USE AND DISCLOSURE OF INFORMATION**

The Company provides you the ability to exercise certain controls and choices regarding its collection, use, and sharing of your information. In accordance with local law, your controls and choices may include:

- You may correct, update, and delete your account information.
- You may change your choices for subscriptions and newsletters.
- You may choose whether or not to receive offers from the Company.
- You may choose whether you receive targeted advertising from the Company or its partners.

## **8. UPDATING INFORMATION**

You can help ensure that your contact information and preferences are accurate, complete, and up to date by logging in to your account. For other personal information that the Company holds, the Company will provide you with access for any purpose including to request that the Company correct the data if it is inaccurate or delete the data if the Company is not required to retain it by law or for legitimate business purposes. The Company may decline to process requests that are frivolous, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

## **9. HOW DOES THE COMPANY PROTECT YOUR PERSONAL INFORMATION?**

The Company has implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, change, and disclosure. All information you provide to the Company is stored on its secure servers behind firewalls. The safety and security of your information also depends on you. Where the Company has given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. The Company asks you not to share your password with anyone. In addition, the Company urges you to be careful about giving out information in public areas of the Services. Any user of the Services may view the information you share in public areas.

**No Security Guarantees:** Although the Company takes appropriate measures to safeguard against unauthorized disclosures of information, the Company cannot assure you that information will never be disclosed, altered, or destroyed in a manner that is inconsistent with this policy.

#### **10. WHERE IS YOUR PERSONAL INFORMATION KEPT?**

This policy is intended to cover collection of information on or through the Services from residents of the USA. If you are visiting the Services from outside the USA, please be aware that your information may be transferred to, stored, and processed in the USA where the Company's servers are located and the Company's central database is operated. The data protection and other laws of the USA and other countries might not be as comprehensive as those in your country. Please be assured that the Company seeks to take reasonable steps to make sure that your privacy is protected. By using the Company's services, you acknowledge that your information may be transferred to the Company's facilities and those third parties with whom the Company shares it as described in this policy. When you provide personal information to the Company through the Services, you consent to the processing of your data in, and the transfer of your data to, the USA or any other country in which the Company or its affiliates, subsidiaries, or service providers host these services.

#### **11. CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, you may have certain additional rights. California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by the Company to third parties for the third parties' direct marketing purposes. You can request information about how Company has collected, used, and shared your personal information during the past 12 months.

Further, if you are a California resident and would like to opt out from the disclosure of your personal information to any third party for direct marketing purposes, please send an email to [info@citiscscapeapp.com](mailto:info@citiscscapeapp.com). Please be advised that if you opt out from permitting your personal information to be shared, you may still receive selected offers directly from the Company in accordance with California law.

We are required by the California Consumer Privacy Act of 2018 (“CCPA”) to provide to California residents an explanation of how we collect, use and share their personal Information, and of the rights and choices we offer California residents regarding our handling of their personal information. See provisions above. To see CCPA-defined categories of personal information, go to the following link: <http://leginfo.legislature.ca.gov/>

This notice and the privacy rights it describes do not apply to information related to our business contacts, job applicants, or employees.

## **12. DO NOT TRACK POLICY**

Do Not Track (“DNT”) is a privacy preference that you can set in your browser. DNT is a way for you to inform websites and services that you do not want certain information about your webpage visits collected over time and across websites or online services. The Company is committed to providing you with meaningful choices about the information it collects and that is why the Company provides you the ability to opt out. But the Company does not recognize or respond to any DNT signals as the Internet industry works toward defining exactly what DNT means, what it means to comply with DNT, and a common approach to responding to DNT.

## **13. OTHER WEBSITES**

The Services may contain links to other websites. Please be aware that the Company is not responsible for the content or privacy practices of those other websites. The Company encourages its customers to be aware when they leave the Services and to read the privacy statements of any other website that collects personally identifiable information.

## **14. RIGHTS OF THIRD PARTIES**

This policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of the Services.

## **15. DIGITAL MILLENNIUM COPYRIGHT ACT**

The Website complies with the Digital Millennium Copyright Act (DMCA). If you reasonably believe that your copyrighted work has been used or posted by a third party without your consent, you shall report it to the Company.

By submitting a copyright infringement notice or other communication (including communications about content stored on or transmitted through the Services), you consent to have these communications forwarded to the person or entity that stored, transmitted, or linked to the content addressed by your communication, to facilitate a prompt resolution. The Company forwards DMCA infringement notices (including any personally identifying information contained in the notices) as submitted to the Company without any deletions.

## **16. CHANGES TO PRIVACY POLICY**

Although most changes are likely to be minor, the Company may change this policy on one or more occasions, and in its sole discretion. The Company encourages visitors to frequently check this page for any changes to this policy. Your continued use of the Services after any change in this policy will constitute your acceptance of the changes.

## **17. CONTACT INFO**

To ask questions or comment about this policy and the Company's privacy practices, you can reach the Company at: [info@citiscapapp.com](mailto:info@citiscapapp.com).