

## Privacy Policy

The Lafferty Group Real Estate & Consulting PA 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”) that display or link to this Policy and our other products, services, and technology solutions (collectively, the “Services”).

Last Updated: June 24, 2020

<b>Overview of Our Collection and Use of Personal Information</b>	
<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 15 below.</p>	
<b>Categories of personal information We Collect</b>	<b>Use of personal information</b>
<p><b>Name, contact information and other identifiers:</b> such as name, contact information, IP address and online identifiers, Social Security number and other government identifiers.</p>	<ul style="list-style-type: none"> <li>● <i>Providing support and services</i></li> <li>● <i>Analyzing and improving our business</i></li> <li>● <i>Personalizing content and</i></li> </ul>
<p><b>Customer records:</b> 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><b>Protected classifications:</b> 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><b>Commercial Information:</b> including records of real property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.</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.

**Geolocation data:** precise location information about a particular individual or device.

- *experiences*
- *Advertising, marketing, and promotional purposes*
- *Securing and protecting our business*
- *Defending our legal rights*
- *Auditing, reporting, corporate governance, and internal operations*

	<p style="text-align: right;"><i>ations</i></p> <ul style="list-style-type: none"> <li>● <i>Complying with legal obligations</i></li> </ul>
<p><b>Audio, video, and other electronic data:</b> such as, video footage, photographs, call recordings, and other audio, electronic, visual, or similar information.</p>	
<p><b>Employment history:</b> professional or employment-related information.</p>	
<p><b>Education information:</b> education information and records.</p>	
<p><b>Profiles and inferences:</b> inferences drawn from any of the above used to create a profile reflecting an individual's preferences, behaviors or other characteristics.</p>	
<p><b>Individual rights.</b> Please see Your Rights and Choices in Section 10 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 15 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.</p>	

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

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 Realogy Holdings Corp. brands, and from other third parties. For example, without limitation:

**Social media.**

If you choose to link, create, or log in to your Services 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 Services, 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 Services 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. LEGAL BASES FOR OUR PROCESSING OF PERSONAL INFORMATION**

Certain laws, including the EU General Data Protection Regulation (“GDPR”), requires that we inform applicable individuals of the legal bases for our use and other processing of personal information. Pursuant to the GDPR (and other relevant laws), we process personal information for the following legal bases:

- **Performance of contract:**  
as necessary to enter into or carry out the performance of our contract with you.
- **Compliance with laws:**  
for compliance with legal obligations and/or defense against legal claims, including those in the area of labor and employment law, social security, and data protection, tax, and corporate compliance laws.
- **Our legitimate interests:**  
in furtherance of our legitimate business interests including:
  - Performance of contracts with franchisees and other parties
  - Implementation and operation of global support (e.g., IT) services for our business operations
  - Customer relationship management and improving our Services, including marketing and analytics
  - Fraud prevention, including misuse of company IT systems or money laundering
  - Physical, IT, and network perimeter security
  - Internal investigations
  - Mergers, acquisitions, and reorganization, and other business transactions
- **With your consent:**  
where we have your consent (the GDPR (where it applies)) and other applicable laws give you the right to withdraw your consent, which you can do this at any time by contacting us using the details at the end of this privacy notice. In some jurisdictions, your use of the Services may be taken as implied consent to the collection and processing of personal information as outlined in this privacy notice.

In addition, we may process your personal information where necessary to protect the vital interests of any individual.

#### 4. 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. Where GDPR or other relevant laws apply, we have set forth the legal bases for such processing *in parenthesis* (see above for further explanation of our legal bases).

- **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. (*Legal basis: performance of our contract with you; and our legitimate interests*)
- **Analyzing and improving our business:**  
including to better understand how users access and use our Services, to evaluate and improve our Services 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. (*Legal basis: our legitimate interests*)
- **Personalizing content and experiences:**  
including to provide or recommend features, content, social connections, and referrals; tailor content we send or display on our Services; to offer location customization and personalized help and instructions; and to otherwise personalize your experiences. (*Legal basis: our legitimate interests and/or with your consent*)
- **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. (*Legal basis: our legitimate interests and/or with your consent*)
- **Securing and protecting our business:**  
including to protect and secure our business operations, assets, Services, 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. (*Legal basis: our legitimate interests and/or compliance with laws*)
- **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. (*Legal basis: our legitimate interests and/or compliance with laws*)

- **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.  
(Legal basis: our legitimate interests and/or compliance with laws)
- **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.  
(Legal basis: our legitimate interests and/or compliance with laws)

**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.

**5. 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 provide our Services, 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 Services.
  - 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 Services, such as comments, social media posts, or other features viewable by the public or generally by registered users of the Services.
  - third parties with whom you choose to let us share information, for example other apps or websites that integrate

with the Services, 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.

#### ***Anonymized and Aggregated Data.***

We may share aggregate or de-identified information with third parties for research, marketing, advertising, analytics, and other purposes.

#### ***Cookies, Tracking, and Analytics***

Our Services 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 Services. For instance, when you visit our Services, our server may record your IP address (and associated location information) and other 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 Services, as well as date and time stamps associates with your activities on our Services.

We use the information for security purposes, to facilitate navigation, to personalize and improve your experience while using the Services, to improve and measure our advertising campaigns and to better reach users with relevant advertising both on our Services and on third party websites. We also gather statistical information about use of the Services 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 Services. 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 Service.

*Essential cookies* are essential, as they enable you to move around the Service and use its features. Without these cookies we could not, for example, authenticate your login or remember that you are logged-in as you move through the Service.

*Functionality cookies* allow us to remember choices you make (such as the region you're in) and tailor the Service to provide enhanced features and content for you. For instance, they can be used to remember your login details or remember your nickname when you next login. They may also be used to provide services you've requested, for example leaving a comment on the Service.

*Analytics & performances cookies* collect information about how the Service is used, for example which pages users visit most often and if any error messages are displayed on certain pages. Information collected using these cookies is used to monitor activity on the Service and understand how it is being used.

If you have disabled one or more cookies, we may still use information collected from cookies before your disabled preference was set. However, we will stop using the disabled cookie to collect any further information.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### ***Pixel tags and other similar technologies.***

Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Websites to, among other things, track the actions of users of the Websites (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Websites and response rates. We and our service providers may also use pixel tags in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, track whether our emails are forwarded, and conduct analytics.

#### ***Log files.***

Most browsers collect certain information, such as your IP address, device type, screen resolution, operating system version and internet browser type and version. This information is gathered automatically and stored in log files.

#### ***Third party analytics tools.***

Our Websites use automated devices and applications operated by third parties, such as Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Websites and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), and you can opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

#### ***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 Services 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.

You can manage how your preferences regarding third party ad company cookies set by this Service by reading the cookie discussion above.

Please also see the cookie discussion above for information about the third parties we may work with to display targeted ads on third-party sites and to measure the success of our marketing and campaigns. You may also obtain more information about targeted or “interest-based advertising” and opt-out of many ad networks at the industry websites below:

- Canada: [www.youradchoices.ca](http://www.youradchoices.ca)
- EU: [www.youronlinechoices.eu](http://www.youronlinechoices.eu)
- U.S.: [www.aboutads.info](http://www.aboutads.info)

## **6. SOCIAL FEATURES AND THIRD PARTY PLUG INS**

The Services 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.

## **7. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

The Services are hosted on servers located in the United States. Note that some countries may not provide the same level of data protection as your home country. If you are located, for example, in European Economic Area or Switzerland (collectively, “EEA”), your personal information will be transferred to the United States and possibly to other jurisdictions (e.g., to the location of a property for which you have requested information), which may not provide the same level of protection under your local data protection laws. In such cases, we rely on suitable personal information transfer safeguards. You may have the right to request a copy or information about those safeguards by contacting us as detailed below.

## **8. 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”).

## **9. 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.

## **10. YOUR RIGHTS AND CHOICES**

### ***Marketing.***

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.

### ***Cookies and similar technologies.***

Please review your browser or device settings for certain cookies and see above to exercise certain choices regarding cookies.

### ***Access, amendment and deletion.***

Under applicable privacy laws, you may have the right to request to review, make amendments, have deleted or otherwise exercise your rights over your personal information that we hold, subject to certain legal limitations and requirements. If you are subject to such a privacy law, you may submit a request to us related to your personal information:

- By contacting us at (772) 562-9700

We follow applicable law to take steps to keep your personal information accurate, complete and up-to-date. In your request that is covered by an applicable privacy law, please make clear what personal information you would like to have changed, whether you would like to have your personal information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your personal information. 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.

***As outlined below, if you are a California resident or if you are in the European Union / European Economic Area, you may have additional rights.***

### ***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.

### ***Responding to Requests.***

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed. We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

### ***Additional information for certain jurisdictions.***

We are committed to respecting the privacy rights of individuals under all privacy laws applicable to us. Some privacy laws require that we provide specific information about individual rights to applicable consumers, which we have set forth at the end of this privacy notice:

- ***California:***  
if you are a California resident, you have certain rights, under California privacy laws, regarding your personal information as set forth in Section 15 below.
- ***EU/EEA:***  
if you are in the European Union / European Economic Area, we provide further details about your rights under the GDPR in Section 15 below.

## **11. CHILDREN**

The Services 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 .

## **12. THIRD-PARTY WEBSITES**

The Services 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.

## **13. 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.

## 14. CONTACT US

If you have any questions or concerns about this Policy, please use the following contact information:

Email: [info@thelaffertygroup.com](mailto:info@thelaffertygroup.com)

Mailing address: 939 17th St Vero Beach, FL 32960

Phone number: (772) 562-9700

## 15. ADDITIONAL INFORMATION FOR RESIDENTS IN CERTAIN JURISDICTIONS

### **California Residents.**

In this section, we provide information for California residents, as required under California privacy laws, including the California Consumer Privacy Act (“**CCPA**”), which requires that we provide California residents certain specific information about how we handle their personal information, whether collected online or offline. This section does not address or apply to our handling of publicly available information made lawfully available by state or federal governments or other personal information that is subject to an exemption under the CCPA.

### ***Categories of personal information that we collect and disclose.***

Our collection, use and disclosure of personal information about a California resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident. The table below sets out generally the categories of personal information (as defined by the CCPA) about California residents that we collect, sell, and disclose to others for a business purpose. We collect these categories of personal information from the sources described in the Information We Collect section above, and for the purposes described in the Disclosure of Personal Information section above.

<b>Categories of personal information</b>  Last Updated: June, 2020	Do we collect?	Do we disclose for business purposes ?
<b>Name, contact information and other identifiers:</b>  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.	Yes	Yes

<p><b>Customer record:</b></p> <p>paper and electronic customer records containing personal information, including without limitation, name, signature, physical characteristics or description, address, telephone number, education, current employment, employment history, social security number, passport number, driver's license or state identification card number, insurance policy number, bank account number, credit card number, debit card number, or any other financial or payment information, medical information, or health insurance information.</p>	Yes	Yes
<p><b>Protected classifications:</b></p> <p>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>	Yes	Yes
<p><b>Commercial Information:</b></p> <p>including records of real property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.</p>	Yes	Yes
<p><b>Usage data:</b></p> <p>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.</p>	Yes	Yes
<p><b>Geolocation data:</b></p> <p>precise geographic location information about a particular individual or device.</p>	Yes	Yes
<p><b>Audio, Video and other Electronic Data:</b></p> <p>audio, electronic, visual, thermal, olfactory, or similar information such as, CCTV footage, photographs, and call recordings.</p>	Yes	Yes
<p><b>Employment history:</b></p> <p>professional or employment-related information.</p>	Yes	Yes
<p><b>Education information:</b></p> <p>education information that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).</p>	Yes	Yes
<p><b>Profiles and inferences:</b></p> <p>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.</p>	Yes	Yes

### ***Categories of Personal Information Sold.***

The CCPA defines a “sale” as disclosing or making available to a third-party personal information in exchange for monetary or other valuable consideration. While we do not disclose personal information to third parties in exchange for monetary compensation from such third parties, we do disclose or make available the categories of personal information that we collect to our affiliate and subsidiary companies. We also may make certain categories of personal information available to third parties, in order to receive certain services or benefits from them (such as when we allow third party tags to collect browsing history and other information on our Services to improve and measure our ad campaigns), including:

- *Name, contact information and other identifiers*
- *Usage data*
- *Profiles and inferences*
- *Customer Records*
- *Commercial Information*
- *Profiles and inferences*

### ***Rights of California residents.***

California law grants California residents certain rights and imposes restrictions on particular business practices as set forth below.

#### Do-Not-Sell:

California residents have the right to opt-out of our sale of their personal information. Opt-out rights can be exercised by clicking on the “Do Not Sell My Personal Information” (or similar link) at the bottom of this page or the homepage of our website. We do not sell personal information about residents who we know are younger than 16 years old without opt-in consent.

#### Initial Notice:

We are required to notify California residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used.

#### Request to Delete:

California residents have the right to request 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 California residents as required by law.

#### Request to Know:

California residents have the right to 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. California residents also have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including:

- categories of personal information collected;

- categories of sources of personal information;
- business and/or commercial purposes for collecting and selling their personal information;
- categories of third parties/with whom we have disclosed or shared their personal information;
- categories of personal information that we have disclosed or shared with a third party for a business purpose;
- categories of personal information collected; and
- categories of third parties to whom the residents' personal information has been sold and the specific categories of personal information sold to each category of third party.

California residents may make a Request to Know up to twice every 12 months. We will respond to verifiable requests received from California residents as required by law.

Right to non-discriminatio:

The CCPA prohibits discrimination against California residents for exercising their rights under the CCPA. Discrimination may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices, rates, or penalties on residents who exercise their CCPA rights, unless doing so is reasonably related to the value provided to the business by the residents' data.

Financial incentives:

A business may offer financial incentives for the collection, sale or deletion of California residents' personal information, where the incentive is not unjust, unreasonable, coercive or usurious, and is made available in compliance with applicable transparency, informed consent, and opt-out requirements. California residents have the right to be notified of any financial incentives offers and their material terms, the right to opt-out of such incentives at any time, and may not be included in such incentives without their prior informed opt-in consent. We do not offer any such incentives at this time.

***Submitting Requests.***

Do-Not-Sell (Opt-out) Requests, Requests to Know, and Requests to Delete may be submitted:

- Do-Not-Sell: By clicking on the "Do Not Sell My Personal Information" (or similar link) at the bottom of this page or the homepage of our website.
- Requests to Know, Requests to Delete: Submitting a request to us at [info@thelaffertygroup.com](mailto:info@thelaffertygroup.com)
- All requests: By contacting us at (772) 562-9700
- In person: Where applicable at one of our consumer-facing offices, by filling out a request form.

We will respond to verifiable requests received from California residents as required by law. For more information about our privacy practices, contact us as set forth in the "Contact Us" section above.

***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. We will respond to such requests within 30 days of receipt. We may change this Policy and will provide notice of changes through the Services or by email. Your continued use of the Services after notice constitutes your consent to the change.

### ***European Union / European Economic Area***

Individuals in the European Union (EU) and the European Economic Area (EEA) have the following rights, under the GDPR, regarding their personal information:

- ***Right of access:***  
You have the right to obtain from us confirmation as to whether or not personal information concerning you is being processed, and where that is the case, to request access to the personal information. The accessed information includes – among others - the purposes of the processing, the categories of personal information concerned, and the recipients or categories of recipient to whom the personal information have been or will be disclosed. You have the right to obtain a copy of the personal information undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.
- ***Right to rectify and complete personal information:***  
You can request the rectification of inaccurate data and the completion of incomplete data. We will inform relevant third parties to whom we have transferred your data about the rectification and completion if we are legally obliged to do so.
- ***Right to erasure (right to be forgotten):***  
You have the right to obtain from us the erasure of personal information concerning you in limited circumstances where:
  - it is no longer needed for the purposes for which it was collected; or
  - you have withdrawn your consent (where the data processing was based on consent); or
  - following a successful right to object; or
  - it has been processed unlawfully; or
  - the data has to be erased in order to comply with a legal obligation to which we are subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary for:

- compliance with a legal obligation; or
- the establishment, exercise or defense of legal claims.
- ***Right to restriction of processing:***  
You have the right to obtain from us restriction of processing your personal information. In this case, the respective data will be marked and only be processed by us for certain purposes. This right can only be exercised where:
  - the accuracy of your personal information is contested, to allow us verify its accuracy; or

- the processing is unlawful, but you do not want the personal information erased; or
  - it is no longer needed for the purposes for which it was collected, but you still need it to establish, exercise or defend legal claims; or
  - you have exercised the right to object, and verification of overriding grounds is pending.
- We can continue to use your personal information following a request for restriction, where:
  - we have your consent; or
  - to establish, exercise or defend legal claims; or
  - to protect the rights of another natural or legal person.
- **Right to data portability:**  
 You have the right to receive the personal information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another entity without hindrance from us, but in each case only where the processing is (a) based on your consent or on the performance of a contract with you, and (b) also carried out by automated means.
- **Right to object:**  
 You have the right to object at any time to any processing of your personal information which has our legitimate interests as its legal basis. You may exercise this right without incurring any costs. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms. The right to object does not exist, in particular, if the processing of your personal information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.
- **Right to object to our use of your personal information for direct marketing purposes:**  
 You can request that we change the manner in which we contact you for marketing purposes. You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.
- **Right to withdraw consent:**  
 If you have given us your consent for the processing of your personal information, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to obtain a copy of safeguards:**  
 You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside the EU/EEA. We may redact data transfer agreements to protect commercial terms.
- **Right to lodge a complaint with your local supervisory authority:**  
 You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information. We ask that you please attempt to resolve any issue with us first, although you have a right to contact your supervisory authority at any time.