

Ojo Labs Inc. Privacy Policy

Last Updated: May 1, 2018

This Privacy Policy (“Policy”) describes and governs the information collection, use, and sharing practices of OJO Labs, Inc. and our affiliates or subsidiaries (“OJO Labs,” “OJO,” “we,” “us,” and “our”) with respect to your use of OJO Labs’ websites, products, tools, promotions, and any other services that reference this Policy (collectively, the “Services”).

Before you use or submit any information through or in connection with the Services, please carefully review this Policy. By using any part of the Services, regardless of how you access the Services, you consent to the collection, use, and disclosure of your information as further outlined in this Policy. **IF YOU DO NOT AGREE TO THIS POLICY, PLEASE DO NOT USE THE SERVICES.** We will continue to evaluate this Policy as we update and expand the Services and our offerings, and we may make changes to the Policy accordingly. Any changes will be posted here and you should check this page periodically for updates. If we make material changes to this Policy, we will provide you with notice as required by law. Your continued use of the Services will signify acceptance of the terms of the updated Policy.

1. Information We Collect

We collect information in multiple ways, including when you provide information directly to us, and when we passively collect information from you, such as from your browser or device.

a. Information You Provide Directly To Us

We may collect information from you in a variety of ways, such as when you:

- Respond to our communications or communicate with us;
- Register for an account;
- Use certain features that require your information to function;
- Fill out a survey;
- Provide us with Feedback;
- Request certain features (e.g., newsletters, updates, and other products); or
- Post User Content, including comments, to or on any of our Services.

The information you provide directly to us may include, but is not limited to: (i) name; (ii) email address; (iii) physical addresses (e.g. your place of work); (iv) phone number; (v)

birthdate; (vi) details about properties you are interested in and your preferences related to home searches (vii) photographs and audio/video content; and (viii) financial information.

b. Information that is Passively or Automatically Collected

i. *Device/Usage Information*

We may automatically collect certain information about the computer or devices (including mobile devices or tablets) you use to access the Services. As described further below, we may collect and analyze information such as (a) IP addresses, geolocation information, unique device identifiers, IMEI and TCP/IP address, and other information about your computer or device(s), browser types, browser language, operating system, mobile device carrier information, the state or country from which you accessed the Services; and (b) information related to the ways in which you interact with the Services, such as: referring and exit web pages and URLs, platform type, the number of clicks, domain names, landing pages, pages and content viewed and the order of those pages, statistical information about the use of the Services, the amount of time spent on particular pages, the date and time you used the Services, the frequency of your use of the Services, error logs, and other similar information. As described further below, we may use third-party analytics providers and technologies, including cookies and similar tools, to assist in collecting this information.

ii. *Cookies and Other Electronic Technologies*

We may also collect data about your use of the Services through the use of Internet server logs, cookies and/or tracking pixels. A web server log is a file where website activity is stored. A cookie is a small text file that is placed on your computer when you visit a website, that enables us to: (i) recognize your computer; (ii) store your preferences and settings; (iii) understand the web pages of the Services you have visited; (iv), enhance your user experience by delivering content and advertisements specific to your inferred interests; (v) perform searches and analytics; and (vi) assist with security administrative functions. Some cookies are placed in your browser cache while those associated with Flash technologies are stored with your Adobe Flash Player files. Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email, and that are designed to provide usage information like ad impressions or clicks, measure popularity of the Services and associated advertising, and to access user cookies. We also may include Web beacons in email messages, newsletters and other electronic communications to determine whether the message has been opened and for other analytics, personalization and advertising. As we adopt additional technologies, we may also gather additional information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser for more information (e.g., Internet Explorer; Google Chrome; [Mozilla Firefox](#); or Apple Safari). You can also manage the use of Flash technologies, including cookies and local storage objects with the Flash management tools available at Adobe's website. Please note that by blocking any or all cookies, you may not have access to certain features or offerings of the Services.

iii. Location Information

We may collect different types of information about your location, including general information (e.g., IP address, zip code) and more specific information (e.g., GPS-based functionality on mobile devices used to access the Services), and may use that information to customize the Services with location-based information and features. We may use such information to improve the Services, including providing you with location-based features (e.g. to identify listings that may interest you). To deliver customized content and advertising, we may share your location information with our agents, vendors, or advertisers. If you access the Services through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details. If you disable certain functions, you may be unable to use certain parts of the Services.

iv. Information from Third Parties

We may collect information about you or others through our affiliates or through non-affiliated third parties. Third parties have their own policies for handling your information. For a description of how these sites may use and disclose your information, including any information you make public, please consult the sites' privacy policies. We have no control over how any third-party site uses or discloses the personal information it collects about you.

We may also collect information about you or others through non-affiliated third parties. For example, to the extent permitted by law, we may, in our sole discretion, ask for and collect supplemental information from third parties, such as information to verify your identity or trustworthiness, or for other fraud or safety protection purposes. We may combine information that we collect from you through the Services with information that we obtain from such third parties and information derived from any other products or services we provide.

c. Collection of information across personal devices

Sometimes we (or our service providers) may use the information we collect - for instance, log-in credentials, IP addresses, hashed email addresses, and unique mobile device identifiers - to locate or try to locate the same unique users across multiple browsers or devices (such as smartphones, tablets, or computers), or work with providers that do this, in order to better tailor content, features, and advertising, and provide you with a seamless experience across the devices you use to access the Services.

2. How We Use Your Information

We may use the information we collect from and about you for the following purposes:

- For the purposes for which you provided it;
- To recognize and authenticate you on the Services;
- To initiate or to provide the features, services and products available through the Services;
- To process transactions and send related information such as confirmations and invoices;
- To send you information about your relationship or transactions with us, technical notices, updates, account or security alerts, or other communications, such as newsletters to which you have subscribed;
- To contact you with information, surveys, or services that we believe may be of interest to you both regarding our products and Services and those of third parties;
- To process and respond to your inquiries;
- For internal research and reporting;
- To monitor and analyze trends, usage and activities in connection with our Services and for statistical purposes;
- To measure, improve, and understand the effectiveness of content, features, and Services, or develop new Services;
- To personalize the content and advertising that you see on the Services or on other websites;
- To facilitate the sending of SMS messages that provide information to you in response to your inquiries and on behalf of an agent you are communicating with;
- With your consent, to call or send you SMS messages regarding our Services as well as your relationship with us or offers or services that may interest you;
- To detect, investigate, and prevent fraud and other illegal activities;
- To enforce the legal terms that govern your use of the Services; and
- To administer and troubleshoot the Services.

Please note that we may combine information that we collect from you and about you (including automatically-collected information) from one part of our Services with information that we collect from you and about you from other parts of our Services. We may also combine this information with information we obtain about you from our affiliates and/or non-affiliated third parties, and use such combined information in accordance with this Policy.

We may aggregate and/or de-identify information collected through the Services. We may use de-identified and/or aggregated data for any purpose, including without limitation for research, analytics, and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, other users, and/or others.

We may send you commercial emails on behalf of ourselves, our affiliates, and advertisers.

3. When We Disclose Your Information

We may disclose and/or share your information to or with any non-affiliated third parties under the following circumstances:

- Consent. We may disclose your information to any third parties based on your consent to do so when necessary to provide the Services you requested. For example, if you are working with a real estate brokerage, we will disclose your information and preferences with that brokerage and its agents. Similarly, if you are seeking to obtain a mortgage, we may share your information with a mortgage company.
- Service Providers and Sub-Contractors. We may provide access to or share your information with select third parties and sub-contractors who perform services on our behalf, including without limitation, marketing, market research, customer support, data storage, analysis and processing, and legal services.
- Partners with whom we conduct business. When OJO Labs partners with other businesses to offer products and services, we may share your information with those business partners.
- Public Record Information: Home sales and purchases are a matter of public record. Buyers' name and address, the price paid, property taxes, and other information is automatically available from public sites. We may disclose to others some information that typically becomes part of the public record of a home sale or purchase.
- Protection of OJO Labs and Others. You acknowledge, consent, and agree that OJO Labs may access, preserve, and disclose your information and/or any content you submit or make available for inclusion on the Services, if required to do so by law or in a good faith belief that such access, preservation, or disclosure

is permitted by this Policy or reasonably necessary or appropriate for any of the following reasons: (1) to comply with legal process; (2) to enforce this Policy, or other contracts with you, including investigation of potential violations thereof; (3) to respond to claims that any content violates the rights of third parties; (4) to respond to your requests for customer service; and/or (5) to protect the rights, property, or personal safety of OJO Labs, its agents and affiliates, its users, and the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.

- **Business Transfers.** As we continue to develop our business, we may buy, merge or partner with other companies. In such transactions, (including in contemplation of such transactions, e.g., due diligence) user information may be among the transferred assets. If a portion or all of OJO Labs' assets are sold or transferred to a third-party, your information may be included among those transferred business assets.

4. Online Analytics and Advertising

a. Analytics

We may use third-party web analytics services (such as those of Google Analytics) on our Services to collect and analyze the information discussed above, and to engage in auditing, research or reporting. The information (including your IP address) collected by various analytics technologies described in the "Cookies and Similar Technologies" section will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Services, including by noting the third-party website from which you arrive, analyzing usage trends, assisting with fraud prevention, and providing certain features to you. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-out Browser Add-on by clicking [here](#). We may also use Adobe Analytics to analyze and optimize the performance of our websites, advertising, and content. To learn more about Adobe's privacy practices and to make choices regarding Adobe's tracking activities, please click [here](#).

If you receive email from us, we may use certain analytics tools, such as clear GIFs to capture data such as when you open our message or click on any links or banners our email contains. This data allows us to gauge the effectiveness of our communications and marketing campaigns.

b. Online Advertising

We may use third-party advertising technologies that allow for the delivery of relevant content and advertising on our Services, as well as on other websites you visit. We also

work with website analytics and advertising partners, including Google, Doubleclick Campaign Manager, and Facebook, to deliver OJO ads on third party publisher websites, and these partners may set cookies on your device's web browser. The ads may be based on various factors such as the content of the page you are visiting, information you enter such as your age and gender, your searches, demographic data, user-generated content, and other information we collect from you. These ads may be based on your current activity or your activity over time and across other websites and online services and may be tailored to your interests.

We may also allow other third parties (e.g., ad networks and ad servers such as Google Analytics, DoubleClick and others) to serve tailored ads to you on the Services, other sites, and in other applications, and to access their own cookies or other tracking technologies on your computer, mobile phone, or other device you use to access the Services. We may provide our customer information (such as email addresses) to service providers, who may “match” this information in de-identified form to cookies (or mobile ad identifiers) and other proprietary IDs, in order to target or “retarget” you with ads when you visit other websites and mobile applications. (You may opt out of many of these service providers as described in the next paragraph.)

We neither have access to, nor does this Policy govern, the use of cookies or other tracking technologies that may be placed on your computer, mobile phone, or other device you use to access the Services by non-affiliated, third-party ad technology, ad servers, ad networks or any other non-affiliated third parties. Those parties that use these technologies may offer you a way to opt out of ad targeting as described below. You may receive tailored advertising on your computer through a web browser. If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your computer to deliver tailored advertising, you may visit the Network Advertising Initiative’s Consumer Opt-Out link or the Digital Advertising Alliance’s Consumer Opt-Out link to opt-out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for display advertising or customize Google display network ads, you can visit the Google Ads Settings page.

Please note that to the extent advertising technology is integrated into the Services, you may still receive advertisements even if you opt-out. In that case, the advertising will not be tailored to your interests. Also, we do not control any of the above opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

5. Notice Concerning Do-Not-Track Signals

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We do not recognize or respond to browser-initiated DNT signals, as the Internet industry is currently still working toward defining exactly what DNT means, what it means to comply with DNT, and a common approach to responding to DNT. To learn more about Do Not Track, you can do so [here](#).

6. Accessing and Controlling Your Data

In order to ensure that the information we maintain is accurate, you may access certain of your information and delete, change, or modify that information in accordance with applicable laws. You must promptly update us if information you have provided to us previously changes or is inaccurate. Please be advised, however, that certain information may remain visible to OJO Labs. You may be able to request such deletion or modification through the Services or you can email legal@ojolabs.com. Upon your request, we will close your account and remove your information from view as soon as reasonably possible. Please contact OJO Labs at legal@ojolabs.com to request closure of your account. Please be advised that we may retain information from closed accounts to comply with the law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations of any user, enforce our Terms of Use, and/or for any other purposes otherwise permitted by law that we deem necessary in our sole discretion. Once you transmit content through the Services, you may not be able to change or remove it.

7. Consent to Transfer

Our computer systems are currently based in the United States and your personal data will be processed by us in the United States and in other countries. The data protection and privacy regulations in each of these jurisdictions may not offer the same level of protection as in other parts of the world. By using the Services, you agree to this Policy and you consent to the transfer of all such information to the jurisdictions identified above, which may not offer a level of protection equivalent to that required in the jurisdiction in which you reside, and to the processing of that information as described in this Policy.

8. Children’s Privacy

The Services are intended for general audiences and not for children under the age of 13. If we become aware that we have collected personal information (as defined by the Children’s Online Privacy Protection Act) from children under the age of 13, we will take reasonable steps to delete it as soon as practicable.

9. Security

We have implemented administrative, technical, and physical security measures to protect against the loss, misuse and/or alteration of your information. These safeguards vary based on the sensitivity of the information that we collect and store. However, we cannot and do not guarantee that these measures will prevent every unauthorized attempt to access, use, or disclose your information since despite our efforts, no Internet and/or other electronic transmissions can be completely secure.

You are responsible for maintaining the security of your applicable account. To the extent that you engage with the Services via SMS messages, you must protect access to your devices in order to prevent unauthorized access to the Services. If you believe that your account has been accessed without authorization, you must contact us immediately at legal@ojolabs.com immediately. We are not responsible if someone else accesses your account(s) through information or devices that they have obtained from you.

10. Third-Party Links and Services

The Services may contain links to or “frame” third-party websites, applications and other services (e.g., websites related to listings). Please be aware that we are not responsible for the privacy practices of such other sites and services. We encourage our users to be aware when they leave our Services and to read the privacy statements of each and every site they visit that collects their information.

11. Your California Privacy Rights

California Law permits visitors who are California residents to request certain information once per year regarding our disclosure of “personal information” (as that term is defined under applicable California law) to third parties for such third parties’ direct marketing purposes. To make such a request, please send an email to legal@ojolabs.com with “Privacy Support” in the subject line or write to us at OJO Labs, Inc., 720 Brazos St, #110, Austin, TX 78701, Attention Privacy Support.

12. Changes to this Privacy Policy.

OJO Labs reserves the right to change this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Services, or advances in technology. Please check this page periodically for changes. Your continued use of the Services following the posting of changes to this Privacy Policy will mean you accept those changes.

13. Questions About this Policy

If you have any questions about our Policy, you can contact us by emailing us at legal@ojolabs.com. You can also write to us at: OJO Labs, Inc., 720 Brazos St, #110, Austin, TX 78701, Attention: General Counsel.

