PRIVACY POLICY

Introduction

This Online Privacy Policy describes how Place Real Estate Services, LLC and its subsidiaries, (including but not limited to, Place Real Estate Management LLC, and homegenius Real Estate LLC) (collectively "Place Institutional," "we," "us," and "our") collects, uses, shares, retains, secures and stores Your Personal Information that is collected via Place Institutional's Websites and Apps.

This Privacy Policy applies to all visitors of our Websites and Apps as to our non-financial consumer services and products.

By continuing to visit and use our Website and Apps, You are agreeing to the terms of this Online Privacy Policy. If You do not agree, then please exit this Website and close Your browser. This Privacy Policy is not a contract.

Definitions

"Applicable Data Protection Laws" means all laws, statutes, rules, regulations, ordinances relating to data protection, privacy, data security, security breach notification, the collection, use, processing, sharing, selling and storage of Personal Information in any relevant jurisdiction in the United States and the District of Columbia, including any and all future applicable laws.

"Consumer" means a natural person that is a visitor and/or user of our Websites and Apps.

"Customer" means a natural person that has purchased products or services from us for personal, familial or household use or registered for an account with us.

"Job Applicant" means a natural person that applies for a job with us.

"Personal Information" means Information or personal data that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, or as otherwise defined under applicable federal and state privacy and data protection laws. Personal Information does not include any aggregate or deidentified data that may have been created from Personal Information but can no longer be used to identify, relate to or could reasonably be linked to a Consumer.

"Potential Customer" means a natural person and/or a Consumer that has registered

for an account online through the Websites and Apps or has applied for our products and services.

"Real Estate Agent(s)" means a natural person who has registered for an account with Place Institutional for purposes other than familial, personal or household use.

"Sensitive Personal Information" has the definition under Applicable Data Protection Laws.

"Websites and Apps" (or the terms individually) means place.com, homegeniusrealestate.com and any other branded website or affiliate's website that is linkable or linked to these websites, and all of our branded applications, including rate finder.

"You" or "Your" means a Consumer, a Customer, and a Potential Customer.

Place's Personal Information Collection Practices Overview

Place offers a comprehensive suite of mortgage, risk, real estate, and title services. To provide these services, we may need to collect and process both personal and non-personal information from You. It is our policy to collect and process Personal Information that is necessary to provide our services.

For all visitors of our Websites and Apps, this Online Privacy Policy explains what Personal Information we may collect from You and how that Personal Information is used, who we share or disclose that Personal Information to and How it is stored.

Personal Information Collected Directly from You when You Visit our Websites and Apps
We collect certain Personal Information from You in order to operate our Websites and Apps effectively and provide You with the best experiences, products and services when You visit and use them. We describe what information we collect and how we obtain it below.

Personal Information Provided by You

When You register for an account with us online, we may collect certain Personal Information about You such as Your name, address, e-mail address, and telephone number and password. Depending on why You are registering for an account with us, we may also need to collect some of Your Sensitive Personal Information, such as Your financial information.

If You are a Potential Customer, we collect certain Personal Information from You in order to provide You with our services that You have requested, such as a quote for title or mortgage insurance. We may also need to collect Your Sensitive Personal Information in order to complete the underwriting process and sign You up as a Customer, such as Your gender, social security number and financial information. If You become one of our valued title insurance Customers, You can learn more about how we handle Your information here.

Personal Information collected automatically

- We may automatically collect information from You when You visit our Websites and Apps. This information may include Your IP address, location data, Your browser type and language, access times, the content of any undeleted cookies that Your browser previously accepted from us, referring or exit website address, internet service provider, date/time stamp, read receipts, operating system, keystrokes, locale and language preferences, system configuration information, date and time of contact, internet service provider, Your operating system, Your screen resolution and colors, flash versions, and channels.
- We will also automatically collect information to determine whether You are a new Consumer or returning visitor; the pages You visited on the site; how often, or for how long You visit portions of the site; terms You searched on our Websites and Apps and related browsing history; interactions with Website content such as button clicks, downloads, or playing videos; the last page You visit on our site; Your geolocation and set language; the branding, model, and marketing name used to identify Your device; and any other unique identifiers available to recognize You across Your devices.
- We collect personal information, online identifiers, web beacons, web server logs, cookies pixels, digital trackers and other internet activity information that, in each case to the extent that information identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you.See our section entitled Interest -based advertising and Cookie Policy for more information.

Personal Information Collected from Third Parties and Affiliates

We also collect Personal Information about you from third parties such as consumer reporting agencies, service providers, marketing companies, and data providers, and our affiliates such as:

- online identifiers or unique identifiers;
- how you interacted with our advertisements on our sites and other third-party sites;
- inferences about your past browsing or purchasing behavior or shopping history, either specifically or in the aggregate;
- your account name, profile or alias, posts and other related data on a social media site related to us, such as Facebook or Pinterest as provided by social media sites.
- Personal Information to supplement what we already know about you, third parties such as data aggregators or publishers who link your name or email address to other information they have collected.
- analytics on a personal information or aggregate basis regarding your purchasing, browsing, and shopping history.

1. We also use Google Analytics and other third-party web analytics services, to understand how You use Place's Websites and Apps and to collect information about Your use of our Website as well. You can learn more about Google Analytics and how it collects and processes data (including how to control the information sent to Google) here [hyper link to www.google.com/policies/privacy/partners/.] You can opt-out of Google Analytics here [hyperlink to **https://support.google.com/analytics/answer/181881?hl=en**] Please note that our Websites' use and transfer to any other website or application of information received from Google APIs will adhere to Google API Services User Data Policy, as outlined below, and as can be found here: **https://developers.google.com/terms/api-services-user-data-policy**.
2. Additional Limits on Use of Your Google User Data: Notwithstanding anything else in this Privacy Policy, if You provide our Websites and Apps access to the following types of Your Google data, our use of that data will be subject to these additional restrictions:
    1. Our Websites and Apps will only use access to read, write, modify or control Gmail message bodies (including attachments), metadata, headers, and settings to provide a web email client that allows users to compose, send, read, and process emails and will not transfer this Gmail data to others unless doing so is necessary to provide and improve these features, comply with applicable law, or as part of a merger, acquisition, or sale of assets.

2. Our Websites and Apps will not use this Gmail data for serving advertisements.
3. Our Websites and Apps will not allow humans to read this data unless we have Your affirmative agreement for specific messages, doing so is necessary for security purposes such as investigating abuse, to comply with applicable law, or for the App's or Site's internal operations and even then only when the data have been aggregated and anonymized.
4. Our Websites and Apps' use and transfer to any other app of information received from Google APIs will adhere to **Google API Services User Data Policy**, including the Limited Use requirements.

How do we Use Your Personal Information

To Service Our Websites and Apps and Apps

We use Personal Information collected to ensure that our Websites and Apps are working as intended and for analytics purposes, to understand how our Websites and Apps are operating and learn how they can be improved. We also use this Personal Information as needed for auditing purposes as well.

For Marketing Purposes

If You have filled out a contact form with us or signed up to receive job alerts from us, we may use this Personal Information to send You those job alerts or marketing communications including emails, to offer our products and services to You and to offer our affiliates' products and services to You. We also may allow certain business partners to use your information as well for targeted marketing. You can opt out of receiving these communications at any time by clicking the "opt out" link at the bottom of these emails or by emailing legal-dept@place.com.

To Evaluate and Improve our Customer Service

We may use Your Personal Information to ensure we are providing the highest level of customer service, and to identify any potential gaps or potential improvements to the same.

In Order to provide You with our Services

If You are a Potential Customer and seeking an insurance quote or more information about our services, we will use Your Personal Information to provide You with those services as requested. We may also share your Personal Information through other technologies and businesses to provide you with better information for our products and services. In these cases, these parties may share your personal information with us as well and we would then provide more detailed service results to you. We also may use your Personal Information to test and improve our products.

In Order to Respond to Requests from You or Assess your Job Application

If You have requested further information, applied for a job with us or in any other way requested that we contact You, we will use Your Personal Information to respond to such a request.

For Our Legal Purposes

We also use Personal Information in order to comply with certain legal rules and regulations that we are subject to.

How Does Place Institutional Use Cookie and Tracking Technologies?

PLEASE READ THROUGH THIS SECTIONS AS IT DESCRIBES HOW WE USE OF COOKIES, BEACONS, PIXELS AND OTHER TRACKING TECHNOLOGIES, HOW YOUR PERSONAL INFORMATION IS COLLECTED, USED, DISCLOSED, SHARED AND RETAINED WHEN YOU VISIT OUR SITES AND YOUR RIGHTS TO STOP THE USE AND SHARING OF THIS PERSONAL INFORMATION. IF YOU DO NOT WANT TO ALLOW THESE COOKIES, PLEASE SEE YOUR OPT OUT RIGHTS BELOW.

What is Interest-Based Advertising?

We and our business partners display interest-based advertising using information gathered about you over time across multiple websites or other platforms, which may include apps. Interest-based advertising, also referred to as “online behavioral advertising", includes ads served to you after you leave our website, encouraging you to return. They also include ads we think are relevant based on your browsing habits, interests or online activities. These ads might be served on websites or on apps. They might also be served in emails. We might serve these ads, or third parties may serve ads. They might be about our products or other companies’ products.

How do We Gather Relevant Information About You for Interest-Based Advertising?

Our services use cookies and other digital trackers for a variety of purposes, including

- to identify you and track your use of our products and services,
- to remember your preferences, enable advertisement delivery to you,
- for security purposes and fraud prevention,
- to enable certain online functions (e.g., sign-in to your account),
- to perform analytics, combat fraud,
- to respond to your requests,
- to create a profile about your interests, browsing behavior, andyour purchase behavior.
- to advertise or offer you products and services across platforms,
- monitor and record communications across the services, such as capturing your scrolling activities, browsing behavior, heat maps, monitor and record all communications, to and from the services, and
- to improve and administer the services.

For avoidance of doubt, you hereby acknowledge, agree and consent to such monitoring and recording by us and our third-party partners about your interests.

We may also share any of the data collected by these cookies and tracking technologies with third parties for our business purposes described above.

Who We May Share Your Personal Information With

Generally, we share Your Personal Information as necessary to provide the services You request, which may include sharing information with certain third parties, such as service providers. We also may share Your Personal Information when required to by law; to protect Your rights and safety, and with Your consent.

Specifically, we may share Your Personal Information with third parties, including:

Authorized service providers:

We share Your Personal Information with our authorized service providers that perform certain services on our behalf. These services may include relationship management software; website hosting; evaluators, contractors and auditors; email marketing providers; customer service providers; marketing agencies, providers that perform business and operations analysis for us; and providers that support and maintain our Websites and Apps and Apps, including providing analytics services for us.

Regulators and government entities:

Upon a valid request or in connection with a legal reason, we may provide Your Personal Information to regulators and other governmental entities for fraud investigations or other regulatory purposes.

Our Advertising Partners:

We also allow third parties through an advertising network or social media sites to target custom content and ads to You on Place Institutional Sites and other websites. This may include affiliate companies or brands or third parties whose products or services we believe may be of interest to you or social media platforms where you interact or where our ads are displayed. These third parties may also share your personal information with others. These third parties may use your personal information for their own marketing purposes or the marketing purposes of others. This may include the delivery of interest-based advertising. We may also share aggregated and deidentified data with social media sites, online advertising companies and marketing and advertising providers for our marketing and advertising programs.

Our Business Partners:

We may also share Personal Information with third party business partners to provide you additional products and services. These business partners may use your Personal Information to market to You and provide You with their products and services as well as our own.

For a Legal Reason:

We may have to share Your Personal Information in response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.

To Prevent Fraud or Illegal Conduct:

We may have to share Your Personal Information in situations where we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our consumers, our employees, or others; or to enforce our terms of service or other agreements or policies.

For Corporate Reasons:

We may also share Your Personal Information as part of a sale, merger, or change in control or ownership of Place, or in the unlikely event of bankruptcy, or in preparation for any of these events. If such an event should happen, the new entity would have the right to continue to use Your Personal information, but only in the manner that is set out in this Online Privacy Policy, unless You otherwise agree.

With Your consent:

To other third parties that You provide us with Your consent to share Your Personal Information with.

Affiliates:

To our affiliates for their everyday business purposes as well as marketing purposes so that they may offer You products and services.

How Long do We Store and Maintain Your Personal Information?

We only store and maintain Your Personal Information for as long as it is necessary to fulfill the purpose for which it was collected, to comply with legal obligations and/or other purposes permissible under applicable laws. For example, if You sign up to receive our newsletters or to receive job alerts, we will store and maintain Your Personal Information to continue to send You these materials until You opt out of receiving such communications.. If You are a Potential Customer we only use and store Your information until we have provided our serviced to You and then if You become a Customer, until You are no longer our Customer.

State Specific Disclosures

We may choose or be required by law to provide different or additional disclosures relating to the processing of personal information about residents of certain states which has applicable data protection laws. Please refer below for disclosures that may be applicable to you:

We Use, Disclose and Share your Personal Information as follows:

Category of Personal Information	**Use Cases**	**Categories of Recipients to Whom Personal Information Is**	**Categories of Third Parties to Whom Personal Information Is Sold or Shared for**

		Disclosed for Business Purposes	Targeted or Behavioral Advertising, Profiling or Other Purposes
Identifiers, such as name, email address and other information	To provide our products and services; to improve our products and services; to respond to your requests or questions, including job applications; to determine your eligibility; for marketing purposes; for security purposes; to comply with law or to protect ourselves or third parties; for internal business purposes; as otherwise permitted by law or as we may notify you	Our service providers in order to facilitate Your purchase of our products, Data Service Providers, IT Service Providers, Legal Representatives, Law Enforcement, Courts, or other related Legal third parties that are not our legal representatives, Auditors, Accounting Representatives, Our Affiliated Brands and Companies, Nonaffiliated third parties	Our Affiliated Brands and Companies, and nonaffiliated third parties
California Customer Records (Cal. Civ. Code § 1798.80(e)), such as birthdate, credit card number and billing address	To provide our products and services; to improve our products and services; to respond to your requests or questions; to determine your eligibility; for marketing purposes; for security purposes; to comply with law or to protect ourselves or third parties; for internal business purposes; as otherwise permitted by law or as we may notify you	Our service providers in order to facilitate Your purchase of our products, Data Service Providers, IT Service Providers, Legal Representatives, Law Enforcement, Courts, or other related Legal third parties that are not our legal representatives, Auditors, Accounting Representatives, Our Affiliated Brands and Companies, Nonaffiliated third parties	n/a

Commercial Information, such as browsing history and other information relating to your interests and online behavior	To provide our products and services; to improve our products and services; to respond to your requests or questions; to determine your eligibility; for marketing purposes; for security purposes; to comply with law or to protect ourselves or third parties; for internal business purposes; as otherwise permitted by law or as we may notify you	Our service providers in order to facilitate Your purchase of our products, Data Service Providers, IT Service Providers, Legal Representatives, Law Enforcement, Courts, or other related Legal third parties that are not our legal representatives, Auditors, Accounting Representatives, Our Affiliated Brands and Companies, Nonaffiliated third parties	Our Affiliated Brands and Companies; and nonaffiliated third parties
Internet / Network Information, such as IP address, device identifier, mobile operating system, the site you came from, what site you visit when you leave our Websites and Apps, how often you use our Websites and Apps	To provide our products and services; to improve our products and services; to respond to your requests or questions; to determine your eligibility; for marketing purposes; for security purposes; to comply with law or to protect ourselves or third parties; for internal business purposes; as otherwise permitted by law or as we may notify you	Our service providers in order to facilitate Your purchase of our products, Data Service Providers, IT Service Providers, Legal Representatives, Law Enforcement, Courts, or other related Legal third parties that are not our legal representatives, Auditors, Accounting Representatives, Our Affiliated Brands and Companies, Nonaffiliated third parties	n/a

Geolocation Data, such as estimated based on your IP address	To provide our products and services; to improve our products and services; to respond to your requests or questions; to determine your eligibility; for marketing purposes; for security purposes; to comply with law or to protect ourselves or third parties; for internal business purposes; as otherwise permitted by law or as we may notify you	Our service providers in order to facilitate Your purchase of our products, Data Service Providers, IT Service Providers, Legal Representatives, Law Enforcement, Courts, or other related Legal third parties that are not our legal representatives, Auditors, Accounting Representatives, Our Affiliated Brands and Companies, Nonaffiliated third parties	n/a
Protected Classification Characteristics under California or US Law	None	n/a	n/a
Sensory Information, such as audio, electronic, visual, thermal, olfactory, call recordings, or similar information	To improve our products and services; to respond to your requests or questions; to determine your eligibility; to comply with law or to protect ourselves or third parties; for internal business purposes; as otherwise permitted by law or as we may notify you	Our service providers in order to facilitate Your purchase of our products, IT Service Providers, Legal Representatives, Law Enforcement, Courts, or other related Legal third parties that are not our legal representatives, Auditors	n/a

Other Personal Information, such as information you post on our Websites or Apps or on social media pages, and information you submit to us	To provide our products and services; to improve our products and services; to respond to your requests or questions; to determine your eligibility; for marketing purposes; for security purposes; to comply with law or to protect ourselves or third parties; for internal business purposes; as otherwise permitted by law or as we may notify you	Our service providers in order to facilitate Your purchase of our products, Data Service Providers, IT Service Providers, Legal Representatives, Law Enforcement, Courts, or other related Legal third parties that are not our legal representatives, Auditors, Accounting Representatives, Our Affiliated Brands and Companies, Nonaffiliated third parties	Our Affiliated Brands and Companies
Inferences and Consumer Profiles, such as predictions about your interests and preferences	To provide our products and services; to improve our products and services; to respond to your requests or questions; to determine your eligibility; for marketing purposes; for security purposes; to comply with law or to protect ourselves or third parties; for internal business purposes; as otherwise permitted by law or as we may notify you	Our service providers in order to facilitate Your purchase of our products, Data Service Providers, IT Service Providers, Legal Representatives, Law Enforcement, Courts, or other related Legal third parties that are not our legal representatives, Auditors, Accounting Representatives, Our Affiliated Brands and Companies, Nonaffiliated third parties	Our Affiliated Brands and Companies

Types of Sensitive Personal Information

We will only process your Sensitive Personal Information in accordance with applicable law, such as obtaining your consent prior to processing.

Categories of Sensitive Personal Information	**Use Cases**	**Categories of Recipients to Whom Sensitive Personal Information Is Disclosed for a Business Purpose**	Categories of Third Parties to Whom Sensitive Personal Information Is Sold or Shared for Targeted or Behavioral Advertising, Profiling or Other Purposes
Account Credentials Allowing Access to An Account	None	n/a	n/a
Personal information revealing race, ethnicity, religious or philosophical beliefs, sexual orientation, citizenship, immigration status, citizenship status	None	n/a	n/a
Precise Geolocation from Your Device	To provide our products and services; to improve our products and services; to respond to your requests or questions; to determine your eligibility;	Our Affiliated Brands and Companies	n/a

	for marketing purposes; for security purposes; to comply with law or to protect ourselves or third parties; for internal business purposes; as otherwise permitted by law or as we may notify you		
Biometric Information	None		

Security

Like all businesses, we cannot guarantee the security of the personal information you provide to us. We maintain reasonable administrative, technical and physical safeguards designed to protect personal information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. The safety and security of information also depends on you, please take care in the security of your online practices.

Links to other Sites

Our Websites and Apps may provide links to other websites, such as those of credit bureaus, social media sites or merchants. These links are provided as a courtesy and Place Institutional does not endorse, control, provide, or manage any content, including related privacy controls on any other website. Our connection to those sites is not and should not be considered an endorsement by Place Institutional of the products or services found on those sites. When You use these links to go from our Websites and Apps to another website, You do so at Your own risk. If You choose to link to websites not controlled by Place Institutional, Place Institutional is not responsible for the privacy or security of these sites, including the accuracy, completeness, reliability or suitability of their information. If You are asked to provide information on one of these websites, You are strongly urged to carefully study their privacy policies before sharing Your Personal Information.

Children’s Personal Information

Place Institutional does not knowingly collect Personal Information from children under 16. Our Websites and Apps, products and services are not geared for nor marketed to Children under the age of 16.

Accessing our Sites Globally – Transfer of Data

The Site is governed by and operated in, and in accordance with the laws of the United States. We make no representation that the Site is governed by or operated in accordance with the laws of any other nation. If you are located in the European Union, Canada or elsewhere outside of the United States, please be aware that information we collect may be transferred to and processed in the United States. By using the Site, or providing us with any information, you: (1) acknowledge that the Site is subject to the laws of the United States, (2) consent to the collection, processing, maintenance and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen, and (3) waive any claims that may arise under those laws.

Your Privacy Rights

Depending on in which state you reside and applicable data privacy laws we may grant you the right to make certain privacy requests. Even if you do not live in one of these jurisdictions, we may allow you to make the same requests, and we may take reasonable steps to fulfill them.

The Right to Access, Correct and Delete

As a resident of a state which has comprehensive privacy laws in place, you have the right to request access to, correct or delete the personal information that we have about you, subject to certain legal exceptions. Make your data subject access request by emailing legal-dept@place.com

Right to Opt-Out.

You have the right to direct the us to not sell or share your personal information, opt out of targeted advertising and certain profiling by emailing legal-dept@place.com.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time.

Right of Data Portability.

You have the right to of data portability as well by emailing legal-dept@place.com

Right to Limit or Revoke Your Consent to use Your Sensitive Personal Information.

You have the right to limit or opt out of the use of your Sensitive Personal Information by emailing legal-dept@place.com.

Authorized Agent

If you use an authorized agent to exercise your data subject rights, please note that we require that the authorized agent submit proof in the form of a written authorization from you that they have been authorized to act on your behalf.

Appeals

Depending on your state of residency, you may have the right to appeal a decision we have made in connection with your privacy rights request. All appeals should be submitted via email to legal-dept@place.com with the word “APPEAL” clearly indicated in the subject line. If you are unsatisfied with the way that we have handled your appeal, you may have the right to complain to your state’s Attorney General.

Other California Privacy Rights

California’s “Shine the Light” law (California Civil Code Section § 1798.83) permits users that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to legal-dept@place.com.

Sharing of Real Estate Agent Photos or Likeness

If You are a Real Estate Agent and You upload Your photo or other photos to our Websites and Apps, you agree that we shall have the non-exclusive right and license to use and reproduce any of those photos for our everyday business purposes, including but not limited to the development of marketing and/or promotional materials for our products and services. We also may share such photos and/or likenesses with affiliates and non-affiliates for the purposes listed in Section V, “Why We Collect Your Information” above.

Your Communication Choices

To Unsubscribe from Place Institutional Emails:

If You no longer wish to receive emails from Place, You may cancel the service by replying to the sender with the word “unsubscribe” in the subject line of the e-mail, or by using the unsubscribe link at the bottom of the e-mails You receive from us.

To Opt Out of Marketing Phone Calls:

Email legal-dept@place.com. Please include Your full name and the phone number associated with Your request. We may not be able to process Your request without this information.

Do Not Track (“DNT”) Signals

Although various internet browsers offer an option (usually in the browser preferences) to send a signal to websites You visit asking the site not to track Your actions, Place Instiktutional does not have the ability to respond to DNT signals.

Updates to Our Privacy Policy

From time to time, we may update this Online Privacy Policy. If we do, we will note near the top of this page the date that any changes are made and/or when they become effective. If the changes being made are material, we may alert You to the changes in a more prominent way. By using our Websites and Apps after these changes are made, You agree to the revised version of the Online Privacy Policy.

How to Contact Us

If You have questions or concerns about this Privacy Policy, or if You would like to inform Place Institutional about changes in Your personal information (such as Your address), You may communicate that to us by emailing legal-dept@place.com