

**PRIVACY POLICY** 

Last updated: December 31, 2019

This Privacy Policy is published by LRES Corporation and its subsidiaries or affiliates (referred to herein as "LRES", "we", "our" or "us"). This Privacy Policy applies to any party who we receive information from or about, including but not limited to applicants, customers, consumers, vendors, and users of this website (referred to herein as "you" or "your").

This Privacy Policy applies to all information collected through our website https://lres.com and/or any related sites, services, sales, marketing, or events (referred to herein as the "Services").

## WE WANT YOU TO KNOW

Thank you for choosing to be part of our community at LRES Corporation! We are committed to protecting your personal information and your right to privacy.

When you visit our website https://Ires.com and use our Services, you trust us with your personal information. We take your privacy very seriously. This Privacy Policy is designed to explain how we collect, use, and disclosure your information and your rights related to our practices. Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your personal information with us.

By using our Services, you agree to this Privacy Policy and any future amendments or additions. If you have questions or concerns about this Privacy Policy or our practices with regards to your personal information, please Contact Us.

## WHAT INFORMATION DO WE COLLECT?

### Personal Information You Disclose to Us

We collect personal information that you provide to us such as name, address, contact information, passwords and security data, and payment information.

We collect personal information that you voluntarily provide to us when registering at our website expressing an interest in obtaining information about us or our products and services, when participating in activities related to the Services (including posting messages in our online forums or entering competitions, contests, or giveaways), or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

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#### Publicly Available Personal Information

We collect first name, maiden name, last name, nickname, current and former address, phone numbers, email addresses, business email, business phone number, birth, marriage, divorce, death records, real estate records including purchase and sale prices and neighbor info, business entity filings, corporate affiliations, business associates, family member names and their related information, social media, and other similar data.

#### Credentials

We collect passwords, password hints, and similar security information used for authentication and account access.

#### **Financial Data**

We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by TrustCommerce. You may find their Privacy Policy here: https://www.trustcommerce.com/privacy-policy/. Purchase history, invoice data, and other similar information is also collected.

All personal information that you provide to us must be true, complete and accurate.

#### Information Automatically Collected

We collect IP address and/or browser and device characteristics automatically when you visit our website for Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of sites or our Services, and for internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

#### **Online Identifiers**

We collect cookie identifiers, or others such as the ones used for analytics and marketing, and other similar data.

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#### Information Collected from Other Sources

We collect limited data from public databases, marketing partners, and other outside sources.

We may obtain information about you from other sources, such as public databases, joint marketing partners, as well as from other third parties. Examples of the information we receive from other sources include social media profile information, marketing leads, and search results and links, including paid listings (such as sponsored links).

We regularly receive information in order to perform Services on your or related to a mortgage application or real estate transaction that you may have initiated. We may also receive information from third-party vendors or service providers performing services for us on your behalf.

## HOW DO WE USE YOUR INFORMATION?

We process your information for purposes based on legitimate business interests, the fulfillment of Services, compliance with our legal obligations, and/or with your consent.

We use personal information collected via our Services for a variety of business purposes, which are described in greater detail below. We process your personal information for our legitimate business interests; to enter or perform a Service for you; for compliance with our legal obligations; and/or with your consent.

We may use the personal information we collect or receive:

**To facilitate account creation and logon processes.** If you choose to access our Services or link your account to a third party account (such as your Google or LinkedIn account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of Services.

**To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You may opt-out of our marketing emails at any time. For information on how to opt-put of marketing emails, see the WHAT ARE YOUR PRIVACY RIGHTS section of this Policy below.

**To send administrative information to you.** We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.

To fulfill and manage your orders or information requests. We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.

**To post testimonials.** We post testimonials on our Services that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you

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wish to update, or delete your testimonial, please Contact Us and include your name, testimonial location, and contact information.

**To deliver targeted advertising to you.** We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

**To request feedback.** We may use your information to request feedback and to contact you about your use of our Services.

**To protect our Services.** We may use your information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).

**To enable user-to-user communications.** We may use your information to enable user-to-user communications with each user's consent.

To enforce our Terms of Use, conditions and policies for business purposes, legal and/or contractual reasons.

**To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may use the data we collect and store to respond.

**To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.

To deliver services. We may use your information to provide you with the requested Service.

**To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

**For business purposes.** We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.

### WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We only share information with your consent, to comply with laws, to provide you with Services, to protect your rights, or to fulfill business obligations.

We may process or share data based on:

**Consent.** We may process your data if you have given us specific consent to use your personal information for specific purpose.

**Legitimate Interests.** We may process your data when it is reasonably necessary to achieve our legitimate business interests.

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**Performance of a Contract.** If we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.

**Legal Obligations.** We may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

**Vital Interests.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

**Clients.** We share your information with clients who you have contracted with and who we provide Services for on your behalf.

**Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors, or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include payment processing, data analysis, email delivery, hosting services, customer service, and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data about how you interact with the Services over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, and better understand online activity. Unless described in this policy, we do not share, sell, rent, or trade any of your information with third parties for their promotional purposes.

**Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

**Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you visit the Services. These companies may use information about your visits to our website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

**Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

#### Our Subsidiaries or Affiliates.

**Government or Regulatory Authorities or Law Enforcement**. We may share your information if legally compelled to do so.

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**Aggregate and De-Identified Information.** We may share anonymized or de-identified information about you or your use of our Services for our business purposes. However, except as outlined in this Policy, we will not share identifiable personal information without your consent.

# DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

## WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.

The Services may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this Privacy Policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

## HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Policy or the Services, unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). We will not keep your personal information for longer than two (2) years past the termination of your account or seven (7) years from fulfillment of Services.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

# HOW DO WE KEEP YOUR INFORMATION SAFE?

We aim to protect your personal information through a system of organizational and technical security measures.

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We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

# DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us using one of the methods set forth in the HOW CAN YOU CONTACT US ABOUT THIS POLICY section of this Policy below.

# WHAT ARE YOUR PRIVACY RIGHTS?

You may review, change, or terminate your account at any time.

If you would at any time like to review or change the information in your account or terminate your account, you can:

### **Contact Us**

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt-out of interest-based advertising by advertisers of our Services visit http://www.aboutads.info/choices/.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will be removed from the marketing email list; however, we will still need to send you Service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may:

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#### **Contact Us**

If you have questions or comments about your privacy rights, see the HOW CAN YOU CONTACT US ABOUT THIS POLICY section of this Policy below.

### DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

California residents have specific rights under the California Consumer Privacy Act (CCPA). Access LRES' CCPA Policy here.

### CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

## DO WE MAKE UPDATES TO THIS POLICY?

Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this Privacy Policy from time to time to reflect changes or for other operational, legal or regulatory reasons. If we do revise this Privacy Policy, we will update the "Last updated" date at the beginning of this Policy which is the effective date of the Policy. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes (via website pop-up) or by directly sending you an email notification if you are a registered user of our site. We encourage you to review this Privacy Policy regularly.

### HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions about your information or this policy, you may email Compliance@lrescorp.com or write to:

#### LRES Corporation

Attention: Compliance Department

765 The City Drive South, Suite 300

Orange, CA 92868

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