

Open House Real Estate Investments, Inc.

Privacy Policy for California Residents

Effective Date: January 1st, 2020

Last Updated on: March 14th, 2023

This **Privacy Policy for California Residents** applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this Policy to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (together, "the CCPA") and any terms defined in the CCPA have the same meaning when used in this Policy.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). We also may collect certain information that may be considered "sensitive personal information" that is defined in the CCPA as personal information that is not publicly available and reveals one or more of the following:

- A consumer's Social Security, driver's license, state identification card, or passport number;
- A consumer's account log-in, financial account, debit card or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
- A consumer's precise geolocation;
- A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership;
- The contents of a consumer's mail, email, and text messages unless we are the intended recipient of the communication;
- A consumer's genetic or biometric data; or
- Personal Information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data;

- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

| Category | Examples | Collected |
|---|---|-----------|
| A. Identifiers. | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers. | YES |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories. | YES |
| C. Protected classification characteristics under California or federal law. | Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information). | YES |
| D. Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | YES |
| E. Biometric information. | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | NO |
| F. Internet or | Browsing history, search history, information on a | NO |

| | | |
|---|--|----|
| other similar network activity. | consumer's interaction with a website, application, or advertisement. | |
| G. Geolocation data. | Physical location or movements. | NO |
| H. Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. | NO |
| I. Professional or employment-related information. | Current or past job history or performance evaluations. | NO |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records. | NO |
| K. Inferences drawn from other personal information. | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | NO |

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Website.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information, for example, when you share your information in an application for a lease.
- To provide, support, personalize, and develop our Website, products, and services.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Additionally, we may use or disclose the sensitive personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information
- To provide our website or online services
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations
- To respond to your requests under the CCPA
- For any other purpose described to you when we collect your sensitive personal information; and
- For any other acceptable purposes as set forth in the CCPA.

Retention of Personal Information

We retain each category of your personal information for no longer than is reasonably necessary for one or more business purposes, subject to your right to request we delete your personal information. Due to the nature of the services, it is not possible to predict the length of time that we intend to retain your personal information.

When we determine that it is no longer reasonably necessary to retain your personal information for one or more disclosed business purpose(s) based on the above criteria, we will delete your personal information.

Disclosure of Personal Information

For purposes of this Policy, “sell,” “selling,” “sale,” or “sold,” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, personal information to another business or a third party for monetary or other valuable consideration.

“Share”, “shared,” or “sharing” means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, personal information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

“Cross-context behavioral advertising” means the targeting of advertising to a consumer based on that consumer’s personal information obtained from activity across businesses or distinctly-branded websites, applications, or services, other than the business or distinctly-branded website, application, or service with which the consumer intentionally interacts. (In other words, if we send you an ad based solely on your interaction with us or our services, this is not cross-context behavioral advertising.)

We do not sell or share any personal information, as those terms are defined in the CCPA.

We may disclose your personal information to our “service providers”, to our “contractors”, and to “third parties” (each as defined in the CCPA) for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the case of disclosures to our service providers, our service providers are obligated not to use the personal information for any purpose other than performing the services according to their agreement with us. In the case of our contractors, our contractors are obligated not to use the personal information for any purpose unrelated to the business purpose for which we’ve engaged them.

In the preceding twelve (12) months, we have not disclosed personal information for a business purpose.

| Personal Information Category | Category of Third-Party Recipients | |
|--|---|----------------------|
| | Business Purpose Disclosures | Sales/Sharing |
| A: Identifiers. | NONE | NONE |
| B: California Customer Records personal information categories. | NONE | NONE |
| C: Protected classification characteristics under California or federal law. | NONE | NONE |

| | | |
|--|------|------|
| D: Commercial information. | NONE | NONE |
| E: Biometric information. | NONE | NONE |
| F: Internet or other similar network activity. | NONE | NONE |
| G: Geolocation data. | NONE | NONE |
| H: Sensory data. | NONE | NONE |
| I: Professional or employment-related information. | NONE | NONE |
| J: Non-public education information. | NONE | NONE |
| K: Inferences drawn from other personal information. | NONE | NONE |

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting, selling, or sharing that personal information.
- The categories of third parties to whom we disclose that personal information.
- If we sold, shared or disclosed your personal information for a business purpose, two separate lists disclosing:
 - Sales and shares, identifying the personal information categories and to which categories of recipients we sold or shared it; and

- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

You also have the right to request a copy of your personal information, and/or to request that we transmit your personal information to another entity. To the extent technically feasible, we will comply with your request and provide and/or transmit your personal information in a structured, commonly used, machine-readable format.

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) or contractors to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Right to Correct

You further have the right to request that we correct any of your personal information that is inaccurate by submitting a verifiable request. We will correct any inaccurate personal information pursuant to your request to the extent possible using commercially reasonable efforts. We may deny your correction request if the personal information is accurate. We may also delete your personal information instead of correcting it to the extent such deletion would not negatively impact you.

Right to Limit Use of Sensitive Personal Information

Lastly, you have the right to request that we limit the use and disclosure of sensitive personal information by submitting a verifiable request. If you submit such a verifiable request, we may continue to use or disclose your sensitive personal information to:

- Complete the transaction for which we collected your personal information, provide goods or services that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Use in a short-term and transient manner, including, but not limited to, to facilitate non-personalized advertising shown as part of your current interaction with us, but not including disclosure to third parties or use outside your current interaction with us;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us; or
- Make any other uses of that information that are permitted by the CCPA and its implementing regulations.

Exercising Your Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request by either:

- Calling us at (469) 547-2745.
- Emailing us at CCPA@openhouse-group.com.
- Write us at: 250 E. 1st St, Suite 420, Los Angeles, CA 90012.

Only you, or someone legally authorized to act on your behalf, may make a request to know, correct, or delete related to your personal information.

You may only submit a request to know twice within a 12-month period (unless you specifically request disclosure beyond such 12-month period, in which case, we will process your request with respect to personal information we have collected during the time period you specify, provided that (a) the earliest date that your request may apply to is January 1, 2022, and (b) processing your request does not require disproportionate effort). Your request to know, correct, or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. You do not need to create an account with us to submit a request to know or delete. We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact us.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We do not, and will not, without first obtaining your consent, sell or share your personal information.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the

program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website 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 CCPA@openhouse-group.com or write us at: 250 E. 1st St, Suite 420, Los Angeles, CA 90012.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information described here and in our Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (469) 547-2745

Email: [CCPA@openhouse-group.com]

Postal Address:

Open House Realty & Investments, Inc.

Attn: CCPA/LEGAL DEPARTMENT

250 E. 1st St, Suite 420, Los Angeles, CA 90012