Privacy Policy

EstateSpace, LLC ("*EstateSpace*") is committed to protecting your privacy. This **Privacy Policy** ("*Privacy Policy*") describes the collection, storage, and dissemination practices across our company with respect to information that EstateSpace may obtain about You or the entity that You represent (collectively, "*You*" or "*Your*").

"Consent" means Please read this Privacy Policy carefully. By using or accessing the EstateSpace Products, You are consenting to the collection, transfer, storage, disclosure and use of your personal information as described in this Privacy Policy. If You do not consent to all of the terms of this Privacy Policy, do not download or use EstateSpace Products.

1. WHAT INFORMATION DOES ESTATESPACE COLLECT?

The following describes the types of information EstateSpace may collect about You through the EstateSpace Products, and how EstateSpace uses and maintain that information:

1.1 When you visit our website

EstateSpace websites are design to be freely explored without providing any personal information about yourself. EstateSpace collects navigational information regarding use of the website.

Navigation Information is collected using technologies such as cookies and web beacons to track site usage statistics and visitor preferences, both used to enhance our website and client experience. In some cases, EstateSpace uses third party integrated services, which may collect navigational data.

Third Party Integrated Services are used on our website. Any information collected through such integrated technologies would be collected directly by these third parties for use by them and other parties, subject to the privacy practices and policies of such third parties.

EstateSpace may use Information Collected Through Automated Gathering Tools as You navigate the client onboarding process. These tools gather publicly available information from the internet.

EstateSpace collects Personal Data when You become a client either through the website or by other means, such as, full name, email address, mailing address or other contact information and personal details.

EstateSpace does not participate in Advertising on our website. We do not display ads and do not collect information for that purpose, nor will we sell any personal data to any third-party organization.

1.2 When You use products developed by EstateSpace

EstateSpace collects Analytical Data in our products. Analytical data includes where You accessed the products (IP address and City), how you access the products (user agent, operating system, version), how frequently you accessed the products, the functionality accessed within the products and performance data. In some cases, personal data (collected via the client onboarding process) may be linked to analytical data to improve the client experience.

EstateSpace collects Device Information in our products. Device information includes unique identifiers, such as your mobile device's unique device identifier (UDID) or computer mac address.

EstateSpace products collect Personal Data to allow the client to use the products effectively. This data is contained within the products itself and is never accessed by other EstateSpace products or employees.

EstateSpace products generate information via Log Files. Log files allow EstateSpace products to collect the analytical and device information. In some cases, log files may collect more information, such as error information and what was happening at the time of the error.

1.3 When you use products resold by EstateSpace

EstateSpace integrates third party products to create novel offerings to our clients. Each of these products collect analytical data, device data and produce log files. EstateSpace collects Aggregated Data from these disparate sources.

2. HOW DOES ESTATESPACE USE THE INFORMATION COLLECTED?

The following describes the how EstateSpace uses the types of information we may collect about You through the EstateSpace Products, and how EstateSpace uses and maintain that information:

- **2.1** Navigation Information is used to enhance our website and improve client experience.
- 2.2 Financial data is collected for EstateSpace product billing purposes only. We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain or use information You provide except for the sole purpose of credit card processing on our behalf.
- **2.3** Automated Gathering Information Is used to aid the client onboarding process.
- 2.4 Personal Data, collected through the client onboarding process, is used for identification purposes, to communicate with You regarding Your use of the EstateSpace Products or the terms governing the EstateSpace Product(s), and to facilitate the functioning of the EstateSpace Products. EstateSpace may also use Your Personal Data to notify You of new features on the EstateSpace Products, or to request that You provide feedback to EstateSpace about the EstateSpace Products.
 - Personal Data, collected through EstateSpace products, is never used by EstateSpace. This data is for the benefit of our clients exclusively.
 - Aggregated Data, Analytical Information, Device Information & Log Files are used to diagnose
 defects, improve the user experience and inform EstateSpace of potential new features. Device
 information is also used to uniquely identify a recipient for use with features such as push
 notifications.

TO WHOM DOES ESTATESPACE DISCLOSE INFORMATION ABOUT YOU COLLECTED THROUGH THE ESTATESPACE PRODUCTS?

EstateSpace will not disclose Your Personal Data to any third-party, except as described in this Privacy Policy.

EstateSpace may disclose the information about You (including Your Personal Data) either (i) when EstateSpace has Your permission; or (ii) in any of the following situations without Your permission:

- **3.1** EstateSpace will never disclose and personal information collected via the EstateSpace products we develop.
- 3.2 EstateSpace may disclose information collected about You (including Your Personal Data) to our affiliates, as well as to third party service providers who perform services on behalf of EstateSpace in connection with providing the EstateSpace Resold Products or completing or confirming a transaction that You conduct with EstateSpace. If EstateSpace transfers Your Personal Data to a third-party service provider, that service provider will be contractually required (i) to use such Personal Data only to carry out those services that EstateSpace has requested; (ii) to abide by this Privacy Policy; and (iii) to provide adequate protection for such Personal Data (as required by applicable legal requirements).
- **3.3** In furtherance of providing the EstateSpace Resold Products, EstateSpace may disclose certain information about You (including Your Personal Data) to other users of the EstateSpace Resold Products to the extent they are authorized to receive such information.
- 3.4 As part of a merger, acquisition or other sale or transfer of all or substantially all of EstateSpace's assets or business, EstateSpace may disclose to one or more third-party information obtained about You through the EstateSpace Resold Products (including Your Personal Data). EstateSpace does not guarantee that any entity receiving such information in connection with one of these transactions will comply with all of the terms of this Privacy Policy.
- 3.5 EstateSpace may disclose information about You (including Your Personal Data) to the government or to third parties under certain circumstances when legally obligated to do so, such as in connection with suspected illegal activity in connection with the EstateSpace Products, or to respond to a subpoena, court order or other legal process. EstateSpace reserves the right to release information collected through the EstateSpace Products to law enforcement or other government officials, as we, in our sole discretion, deem necessary or appropriate.
- 3.6 EstateSpace may also disclose information about You (including Your Personal Data) to third parties if needed to enforce any of the terms and conditions of the EstateSpace Products; to conduct any investigation of potential violations thereof; to detect, prevent, or otherwise address fraud, security or technical issues; or to protect against harm to any element of the EstateSpace Products.

If You use the EstateSpace Products outside of the United States, information that we collect about You will be transferred to servers inside the United States and may be maintained indefinitely, which may involve the transfer of information out of countries located in the European Economic Area. By using the EstateSpace Products, You consent to such transfer and processing of data about You.

4. RETENTION OF PERSONAL INFORMATION

We retain personal information that You provide us only as long as we have a legitimate, ongoing business need (for example, as long as is required in order to contact You, or enable Your product usage, with respect to Your Subscription Service and inquiries; or as needed to comply with our legal obligations, resolve disputes and enforce our agreements).

When we have no ongoing legitimate business need to process Your personal information, we securely delete the information or anonymize it or, if this is not possible, then we will securely store Your personal information and isolate it from any further processing until deletion is possible. We will delete this information from the servers at an earlier date if you so request.

You have the following data protection rights:

- You can request access, correction, updates or deletions of your personal information.
- You can object to processing of your personal information, just ask us to restrict processing of Your personal information or request portability of your personal information.
- If we have collected and processed Your personal information with your consent, You can then
 withdraw your consent at any point in time. Withdrawing Your consent will not affect the lawfulness
 of any processing we conducted prior to Your withdrawal including a reasonable amount of time to
 process the request.

You have the right to complain to a data protection authority about our collection and use of your personal information.

5. WHAT SECURITY MEASURES DOES ESTATESPACE EMPLOY FOR INFORMATION ABOUT YOU COLLECTED THROUGH THE ESTATESPACE PRODUCTS?

To help protect the privacy of data collected through the EstateSpace Products, EstateSpace employs security measures intended to be consistent with industry best practices. In addition, EstateSpace takes commercially reasonable steps to store certain data collected through the EstateSpace Products with the objective of protecting such data against unauthorized access. However, no technology is completely secure. Please be aware that the EstateSpace Products are operated on software, hardware and networks; any component of which may, from time to time, experience breaches of security or other problems beyond our control.

Please also be aware that despite our best intentions and the guidelines outlined in this Privacy Policy, no data transmission over the Internet or via a Wi-Fi network, or through any encryption method, can be guaranteed to be completely secure. You understand that it may be possible for third parties not under EstateSpace's control to intercept or access any information about You transmitted through the EstateSpace Products or private communications. Accordingly, although EstateSpace will take reasonable steps to protect the security and integrity of all information You provide through the EstateSpace Products, EstateSpace cannot guarantee that any such information, whether during transmission or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others who do not have Your authorization. Any such transmission or sharing of that information is done at Your own risk.

If You are a user located outside of the United States, please note that some or all of Your Personal Data may be stored or processed on servers located outside of Your country, including in the United States, which has data protection laws that may differ from those where You live. As a result, this information may be subject to access requests from governments, courts, or law enforcement agencies in those other

jurisdictions, according to the law of those jurisdictions. Subject to applicable law in other jurisdictions, EstateSpace will use reasonable efforts to ensure that appropriate protections are in place to maintain protections of Your Personal Data.

6. HOW CAN YOU CORRECT OR UPDATE INFORMATION ABOUT YOU THAT IS STORED BY ESTATESPACE?

You may correct or update information collected about You through the EstateSpace Products (including Your Personal Data) by contacting EstateSpace at the email address noted below. EstateSpace will update our files as promptly as reasonably possible.

EstateSpace may retain original and updated information for reasons such as technical constraints, dispute resolution, compliance with laws, fraud prevention, troubleshooting and agreement enforcement. In addition, EstateSpace is not responsible for updating or removing any information about You collected through the EstateSpace Products that is already disclosed to third parties who have been provided such information as permitted by this Privacy Policy. EstateSpace will, however, take responsible steps to inform other companies that are processing the personal data that the data subject has requested the erasure of any links to, copies of, that data.

At this time, EstateSpace products are not influenced by or with the "Do Not Track" preferences that may be available in Your browser for letting websites know that You do not want them collecting certain kinds of information. Specifically, if You turn on or off, the Do Not Track setting on Your browser, online elements of the EstateSpace Products will not be affected by the Do Not Track preferences You set. For more information about Do Not Track, visit donottrack.us

7. WHAT ARE THE POLICIES OF LINKED WEBSITES AND OTHER THIRD PARTIES?

This Privacy Policy only addresses the use and disclosure of information obtained through the EstateSpace Products by EstateSpace. You should be aware that when You are using the EstateSpace Products, You may be directed to other apps or websites that are beyond our control, and EstateSpace is not responsible for the privacy practices of third parties. EstateSpace is not responsible for the privacy practices of third parties, regardless of whether they are linked or otherwise connected to the EstateSpace Products. EstateSpace encourages You to read the posted privacy policy whenever interacting with any third-party website, app or another offering.

8. WHAT IS OUR POLICY ON CHILDREN USERS OF THE ESTATESPACE PRODUCTS?

EstateSpace does not knowingly collect or maintain personally identifiable information (PII) from persons under 13 years old, and no part of the EstateSpace Products is directed to persons under 13. IF YOU ARE UNDER 13 YEARS OF AGE, PLEASE DO NOT USE ESTATESPACE PRODUCTS AT ANY TIME OR IN ANY MANNER. If You learn that Your child under 13 has provided EstateSpace with personal information without Your consent, please contact EstateSpace.

9. WILL YOUR EMPLOYER HAVE ACCESS TO INFORMATION COLLECTED ABOUT YOU THROUGH THE ESTATESPACE PRODUCTS?

If You use the EstateSpace Products as a representative of a third party, such as Your employer, that party may review and modify Your personal information, you may ask EstateSpace to delete Your personal

information, or request that EstateSpace cease collecting Your personal information. If Your employer asks EstateSpace to delete Your personal information or cease collecting Your personal information, EstateSpace may terminate Your right to access the EstateSpace Products.

10. WHAT LAW GOVERNS YOUR USE OF THE ESTATESPACE PRODUCTS?

By using the EstateSpace Products, or otherwise providing information to EstateSpace, You agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the law of the Commonwealth of Virginia, without reference to the choice of law or conflicts of law principles thereof, and will be subject to the dispute resolution clause contained in the End User License Agreement ("EULA") for the EstateSpace Products (available at https://www.EstateSpace.com). You also agree to abide by any limitation on damages contained in the EULA applicable to the EstateSpace Products or any other Agreement that EstateSpace has with You.

11. WHAT ARE THE TERMS REGARDING ANY FUTURE CHANGES TO THIS PRIVACY POLICY?

EstateSpace reserves the right to update or modify this Privacy Policy from time to time, with any such changes to be effective prospectively. Please visit this page periodically (available at https://www.EstateSpace.com) so that You will be apprised of any such changes. Your continued use of the EstateSpace Products after any modification to this Privacy Policy will constitute Your acceptance of such modification.

12. HOW CAN YOU CONTACT US?

If You have any questions regarding the EstateSpace Products, Services or this Privacy Policy, please contact EstateSpace via email at support@estatespace.com.

[End of Privacy Policy]