

## **Matanky Realty Group, Inc. Privacy Policy**

Effective Date: May 1, 2019

Our privacy policy (“**Policy**”) describes the policies of Matanky Realty Group, Inc. (collectively, along with our affiliates, “we”, “our” or “us”) on how we may collect, process, use, store, share, and disclose your personal information, as defined below, provided to us through your use of our website [www.matanky.com](http://www.matanky.com), Facebook page, LinkedIn page, Instagram account, Twitter account Constant Contact and Outlook email account (collectively, the “Platforms”).

### **WHAT INFORMATION DOES THIS APPLY TO?**

This Policy applies to personal information collected through the Platforms. It covers how we may collect, use, store, share, disclose, and otherwise process such personal information as of the date that this Policy is effective. This Policy does not apply to any other information collected by us through any other means, including through third parties.

“**Personal Information**” is defined in this Policy as information that identifies or can identify you personally and, among other relevant data, may include your:

- Name
- Postal address
- E-mail address
- Phone number
- Location via IP address
- Device being used to access the Service

### **HOW IS INFORMATION COLLECTED?**

We collect the Personal Information you provide directly to us through the Platforms, including when you create an account, provide contact information, or send other Personal Information to us through the Platforms. We may also upload your contact or other Personal Information into the Platforms if you provide that information to us offline or in other ways. Even if you do not send us any Personal Information, we may collect certain non-Personal Information about how you use the Platforms.

When you use the Platforms, we may collect the following Personal Information about you:

We may collect information on your real estate searches and preferences when you use the Platforms, including about whether you plan on leasing, buying or selling real estate, search criteria, information about financing for the purchase of real estate, and other information related to the leasing, purchase or sale of real estate.

We collect information about how you interact with the Platforms, preferences, and settings. In some cases we do this through the use of cookies and similar technologies such as web beacons that create and maintain unique identifiers.

We may collect information about the device and software you use to access the Platforms, including, for example, hardware, operating system, software and file names and versions, preferred language, unique device identifier, advertising identifiers, serial number, and network information.

When you interact with the Platforms, we collect server logs, which may include Personal Information including device IP address, access times, app features accessed, pages viewed, app crashes and other system activity, type of browser, and referral link information.

If you permit the Platforms to access location services used by your device, we may collect the location of your device while you are using the Platforms.

Personal Information sent by you to us through email or other communications methods, including messaging functionalities of the Platforms.

To learn more about your ability to control the collection of the information above regarding your preferences, usage activity, device, software, log and location information through tracking and similar technologies, please see feel free to contact us at the email and telephone number provided below.

## **HOW IS PERSONAL INFORMATION USED?**

We may use the Personal Information collected as described above as follows:

Provide, maintain, and improve the Platforms, including, for example, to send or facilitate communications among you and our real estate professionals, provide products and services you request (and send related information), develop new features, provide customer support, and send updates and administrative messages.

Perform internal operations, including, for example, to troubleshoot bugs and operational issues, improve security; conduct data analysis, testing, and research; and monitor and analyze usage and activity.

Inform you about other services and products that may be available through us, our family of companies, and to provide you a customer survey to assess your satisfaction with our services and products.

Personalize and improve the Service, including to provide or recommend features, content, social connections, referrals, and advertisements.

Sending marketing materials for real estate property sales and leasing listings and entering your data into our constant contact database for marketing emails or telephone calls.

## **HOW IS INFORMATION SHARED?**

We may share the Personal Information we collect about you as described in this Policy or as otherwise described at the time of collection or sharing, including as follows:

We may share your Personal Information:

With our real estate professionals to enable them to provide services you request through the Platforms.

With the public if you submit to a public part of the Platforms, such as comments, social media posts, or other features viewable by the public or generally by registered users of the Platforms.

With third parties with whom you choose to let us share information, for example other apps or websites that integrate with the Platforms, or those with a Platform with which we integrate.

With our affiliates.

With third party or affiliate service providers that provide services or conduct data processing on our behalf, or for data centralization and/or logistics purposes.

In response to a request for information by a competent authority if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation, or legal process.

In connection with the potential merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

In an aggregated, de-identified, or anonymous form which cannot reasonably be used to identify you.

## **SECURITY**

We use technical, administrative, and physical controls in place to protect your Personal Information from unauthorized access, use, and disclosure. We periodically review our security measures to evaluate industry best practices and update accordingly. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable.

## **DATA RETENTION**

We will retain your Personal Information only for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required for our legitimate business purposes or permitted by a law that applies to us.

## **LOCATION OF SERVERS AND TRANSFER OF INFORMATION TO THE UNITED STATES**

The Platforms are hosted on servers located in the United States. Note that some countries may not provide the same level of data protection as your home country. If you are located, for example, in European Economic Area or Switzerland (collectively, “**Europe**”), your Personal Information will be transferred to the United States and possibly to other jurisdictions (e.g., to the location of a property for which you have requested information), which may not provide the same level of protection under your local data protection laws. In such cases, we rely on suitable Personal Information transfer safeguards approved by governing authorities. You may have the right to request a copy or information about those safeguards by contacting us as detailed below.

## **LEGAL GROUNDS FOR THE COLLECTION, USE, SHARING, AND OTHER PROCESSING OF PERSONAL INFORMATION**

Certain jurisdictions, including those in Europe, require the identification of the legal grounds for the collection, use, sharing, and other processing of Personal Information. We rely on the following legal grounds for the collection, use, sharing, and other processing of Personal Information as described in this Policy:

Necessary to provide information or otherwise carry out the performance of a contract with you as an individual;

Our legitimate interests, including:

Customer relationship management, including other forms of marketing and analytics;

Fraud prevention, misuse of company IT systems, or money laundering;

Physical, IT, and network perimeter security;

Internal investigations; and

Intended mergers and acquisitions.

Compliance with legal obligations and/or defense against legal claims, including those in the area of labor and employment law, social security, and data protection, tax, and corporate compliance laws.

Protection of the vital interests of any individual;

Performance of a task carried out in the public interest or in the exercise of official authority vested in us; and

Consent, as permitted by applicable law.

## **HOW DOES SOCIAL SHARING APPLY?**

The Platforms may integrate with social sharing features and other related tools which let you log in to the Platforms or share actions you take on the Platforms. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the social sharing service. Please refer to the privacy policies of those social sharing services for more information about how they handle the data you provide to or share

through them. We do not receive or store passwords to your third party social media accounts in this context.

## **WHAT'S YOUR COOKIE POLICY?**

Cookies are small data files stored in your device memory when you visit a website. Cookies and similar technologies are widely used by websites to make them work more efficiently, as well as to provide information to the website operator about how users are using their website. We may use cookies to improve the Platforms and your experiences. We may also use cookies for analytics purposes, to see which areas and features of the Platforms are popular, and to count visits. Additionally, we may use 'web beacons', which are electronic images that may be used on the Platforms, including in our emails to help deliver cookies, count visits, and understand usage and campaign effectiveness.

## **YOUR RIGHTS AND CHOICES**

You are not required to provide all Personal Information identified in this Privacy Statement to use the Platforms, but certain aspects of the Platforms will not be available to you. However, you can use our services without consenting to non-essential cookies or direct marketing emails; the only consequence is that our products and services will be less communicated, we may not be able to provide the support you seek, and you may miss out on attractive opportunities. Note that in certain cases, your Personal Information will be necessary for us, or an affiliated third party, to comply with legal obligations, or enter into and perform a contract with you.

If you reside in Europe, local data protection law may afford you the right to: obtain confirmation of the existence of certain information relating to you, to verify its content, origin, and accuracy, as well as the right to access, review, obtain a copy, port, delete, or to block or withdraw consent to the processing of certain information (without affecting the lawfulness of processing based on consent before its withdrawal), by contacting us as detailed below. You may also have the right to file a complaint with an applicable supervisory authority regarding our processing of your Personal Information.

You can deactivate your account at any time by contacting us at the email address at the bottom of this page. However, you will not be able to access many of the services if you deactivate your account. Please note that even if you request deactivation of your account, it may take some time to fulfill this request.

You may opt out of receiving promotional messages from us by following the instructions in those messages. If you opt out, we may still send you non-promotional communications, such as those about your account, about services you have requested, and our ongoing business relationship.

## **CHILDREN**

The Platforms are not intended or directed to children under the age of 18, and we do not knowingly collect any Personal Information, or knowingly track the use of our Platforms, from

children. If we have actual knowledge that Personal Information about a child under 18 years old has been collected, then we will take appropriate steps to try and delete such Personal Information.

## **CHANGES TO THIS POLICY; LANGUAGE**

We may amend this Policy at any time. If we make any material change in how we collect, use, disclose, or otherwise process Personal Information, we will prominently post a notice regarding such change on the Platform. Any material changes to this Policy will be effective 10 days after our posting of the updated Policy or as otherwise required by applicable law. Where required to do so by law, we may seek your prior consent to any material changes we make to this Policy. This Policy is provided in English only to avoid any misinterpretations caused by translation. If necessary, please seek appropriate advice before proceeding or do not use the Platform.

## **CONTACT US**

If you have any questions or concerns about this Policy, please contact us.

Email: [marketing@matanky.com](mailto:marketing@matanky.com)

Mailing address:

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