# Privacy Policy

Last Updated August 15, 2023

Welcome to the website (the "Site") of Premium Group Realty. ("PGR," "we," "us," or "our"). You have made the best choice for your future for connecting real estate professionals and other related services.

This Privacy Policy explains what personal information we collect, how we use and share that personal information, and your choices concerning our personal information practices.

Before using the Service or submitting any personal information to Premium Group Realty, please review this Privacy Policy carefully and Contac us if you have any questions. By using the Service, you agree to the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not access the Site or otherwise use the Service.

# 1. PERSONAL INFORMATION WE COLLECT

We collect personal information that alone or in combination with other information in our possession could be used to identify you as follows:

**Personal Information You Provide:** We collect the following categories of personal information from you when you use the Service, including when you request an Agent contact you, or, you apply to join our Team

- **Account Information:** We collect your name, email address, phone number, mailing/billing addresses, and any other information you choose to provide when you create an account with us.
- **Financial Information:** To the extent you pay for certain Services, our payment processor(s) will collect the financial information necessary to process your payments, such as your payment card number and authentication details. Please note, however, that we store only a tokenized version of such information and do not maintain payment card information on our servers.
- **Communication Information:** We may collect information when you contact us with questions or concerns (such as for support purposes) and when you voluntarily respond to questionnaires, surveys or requests for market research seeking your opinion and feedback. Providing communication information is optional to you.
- **Commercial Information:** We may retain a history of the products you browse and/or purchase using the Service.
- Social Media Information: We have pages on social media sites like Instagram, Facebook, Twitter and LinkedIn ("Social Media Pages"). When you interact with our Social Media Pages, we will collect personal information that you elect to provide to us, such as your contact details. In addition, the companies that host our Social Media Pages may provide us with aggregate information and analytics regarding the use of our Social Media Pages.

Personal Information We Process on Behalf of Our Business Customers: In order to provide the Service to our customers, we may collect personal information on behalf of our customers as we assist them with the process of buying or sale a property. Through those connections, we may receive personal information individual names, email addresses, phone numbers and Cookie IDs. We process that information pursuant to our Terms of Service and other agreements with our business customers. If you are such an individual and would no longer like your information to be used by one of our business customers that use our Service or you would like to access, correct, or request deletion of your information, please contact the business customer that you interact with directly.

**Technical and Internet Activity Information:** When you use the Service, we may automatically log the following information:

- **Device Information**: The manufacturer and model, operating system, browser type, IP address, and unique identifiers of the device you use to access the Service. We may also collect diagnostic information relating to app crashes, app performance, network latency, and network errors. The information we collect may vary based on your device type and settings.
- Usage Information: Information about how you use our Service (including on the Site or App), such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency, and duration of your activities. For the Site, we use Google Analytics, a web analytics service provided by Google LLC ("Google") to help collect and analyze Usage Information. For more information on how Google uses this information, click here.
- Location Information: We may derive a rough estimate of your location from your IP address when you visit our website. For users of our App, we may also collect and maintain a history of your precise location information using WiFi and Bluetooth technologies, as well as your device identifiers and GPS coordinates (e.g. latitude/longitude). If you want to prevent the collection of your Location Information, please adjust your settings in your mobile device to limit the mobile application's access to your Location Information.
- **Email Open/Click Information:** We may collect information about the date and time you open or click links in emails we send.

We may use the following technologies to collect the Technical and Internet Activity Information:

- Cookies, which are text files stored on your device to uniquely identify your browser or to store information or settings in the browser to help you navigate between pages efficiently, remember your preferences, enable functionality, help us understand user activity and patterns, and facilitate online advertising.
- Local storage technologies, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.

• **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

#### 2. PERSONAL INFORMATION USE

We use your personal information for the following purposes:

**Service Delivery**, including to:

- Provide, operate, maintain, and secure the Service;
- Create, maintain, and authenticate your account; and
- Process transactions through our third party payment processors.

# Communicating with You, including to:

- send you updates about administrative matters such as changes to our terms or policies; and
- provide user support, and respond to your requests, questions and feedback.

# **Service Improvement**, including to:

- improve the Service and create new features;
- personalize your experience; and
- create and derive insights from de-identified and aggregated information.

# Marketing and Advertising, including for:

- **Direct Marketing:** To send you marketing communications, including notifying you of special promotions, offers and events via email and other means; and
- Interest-Based Advertising: We engage advertising partners, including third party advertising companies and social media companies, to display ads on the Service and other online services. These companies may use cookies and similar technologies to collect Technical and Internet Activity Information over time across the Service, our communications, and other online services, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to similar users (known as a "lookalike audience") on other online platforms. You can learn more about your choices for limiting interest-based advertising in the Limit Online Tracking section below.

# **Compliance and Protection,** including to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);

- Audit our compliance with legal and contractual requirements and internal policies; and
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

#### 3. PERSONAL INFORMATION SHARING

**Our Sharing:** We do not sell, rent, license, or lease your personal information to third parties. However, we may share personal information with:

- **Service Providers**, including hosting services, email services, advertising and marketing services, payment processors, customer support services, and analytics services. We take commercially reasonable steps to ensure our service providers adhere to the Security Standards we apply to your personal information.
- **Professional Advisors**, such as lawyers and accountants, where doing so is necessary to facilitate the services they render to us.
- **Business Transaction Recipients,** such as counterparties and others assisting with a merger, acquisition, financing, reorganization, bankruptcy, receivership, dissolution, asset sale, or similar transaction, and with successors or affiliates as part of or following that transaction.
- **Government Authorities**, where required to do so for the Compliance and Protection purposes described above.
- **Affiliates:** We may share personal information with our current and future affiliates, meaning an entity that controls, is controlled by, or is under common control with Premium Group Realty. Our affiliates may use the personal information we share in a manner consistent with this Privacy Policy.

**Your Sharing:** For users of the App, you may be able to make your personal information available to others, including:

- Other users, such as when you create a profile, post content, and otherwise interact with other users through the App for example your; and
- Other businesses, when you participate in offers, promotions and other features available via the App or marketed to you through the App.

#### 4. PERSONAL INFORMATION RETENTION

We keep personal information until we no longer need it to satisfy the purposes described in this Privacy Policy and we have no legal obligation to keep it.

# 5. CHILDREN

Our Service is not directed to children who are under the age of 16. Premium Group Realty does not knowingly collect Personal information from children under the age of 16. If you have reason to believe that a child under the age of 16 has provided personal information to Premium

Group Realty through the Service please Contact Us and we will endeavor to delete that information from our databases.

#### 6. JOB APPLICANTS

When you apply for a job with Premium Group Realty, we collect the information that you provide in connection with your job application. This includes name, contact information, professional credentials and skills, educational and work history, and other information that may be included in a resume or provided during interviews (which may be recorded). This may also include demographic or diversity information that you voluntarily provide. We may also conduct background checks and receive related information.

We use applicants' information to facilitate our recruitment activities and process employment applications, including evaluating candidates and monitoring recruitment statistics. We use successful applicants' information to administer the employment relationship. We may also use and disclose applicants' information (a) to improve our website, (b) as otherwise necessary to comply with relevant laws, (c) to respond to subpoenas or warrants served on Premium Group Realty, and (d) to protect and defend the rights or property of Premium Group Realty or others.]

#### 7. LINKS TO OTHER WEBSITES

The Service may contain links to other websites not operated or controlled by Premium Group Realty, including social media services ("**Third Party Sites**"). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

#### 8. SECURITY

You use the Service at your own risk. We implement commercially reasonable technical, administrative, and organizational measures to protect personal information both online and offline from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from us may not be secure. Therefore, you should take special care in deciding what information you send to us via the Service or e-mail. Please keep this in mind when disclosing any personal information to Premium Group Realty via the Internet. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the Service, or third party websites.

## 9. INTERNATIONAL USERS

The Service is not intended for use outside the United States. By using our Service, you understand and acknowledge that your personal information will be transferred from your location to our facilities and servers in the United States, where data protection laws may differ from those in your jurisdiction.

#### 10. YOUR CHOICES

**Update or Correct Personal Information:** You can contact us and request any updates or corrections needed to keep your personal information accurate, current, and complete.

**Opt Out of Marketing Communications:** You may opt out of marketing communications by following the unsubscribe instructions in any marketing email we send you. Please note, however, that you may continue to receive communications as described in the Communicating with You section after opting out of marketing communications.

**Limit Online Tracking:** Here are some of the ways you can limit online tracking:

- **Block Cookies:** Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Use the following links to learn more about how to control cookies and online tracking through your browser:
- o Firefox; Chrome; Microsoft Edge; Safari
- **Limit the Use of Advertising ID:** You may be able to limit use of your mobile device's advertising ID for interest-based advertising purposes through your device's settings.
- Use Privacy Plug-Ins or Browsers: You can block our Services from setting cookies used for interest-based ads by using a browser with privacy features, like Brave, or installing browser plugins like Privacy Badger, DuckDuckGo, Ghostery or uBlock Origin, and configuring them to block third party cookies/trackers. You can also install a browser add-on to opt out of Google Analytics.
- Advertising Industry Opt-Outs: You can also use these opt-out options to limit use of your information for interest-based advertising by participating companies:
- Digital Advertising Alliance
- Network Advertising Initiative

Note that the above opt-out mechanisms are specific to the device or browser on which they are exercised. You will need to opt out on every browser and device that you use.

Facebook also allows you to limit how your Technical and Internet Activity Information and browsing history can used to serve advertisements. Click here to learn more.

**Do Not Track.** We currently do not respond to "Do Not Track" or similar signals. Learn more about "Do Not Track" here.

# CHANGES TO THE PRIVACY POLICY

The Service and our business may change from time to time. As a result, we may change this Privacy Policy at any time. When we do we will post an updated version on this page, unless another type of notice is required by the applicable law. By continuing to use our Service or providing us with personal information after we have posted an updated Privacy Policy, or notified you by other means if applicable, you consent to the revised Privacy Policy and practices described in it.

# 11. CONTACT US

If you have any questions about our Privacy Policy or information practices, please feel free to contact us at our designated request address: info@Prealtyny.com.