

# Privacy Policy

Last modified: August 15, 2024

## Introduction

VORO, Inc. and our affiliated and subsidiary companies (collectively, “we”, “our”, or “us”) respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you access [www.voro.com](http://www.voro.com) (“Website”) or use our other services, products, and technology solutions (collectively with the Website, the “Services”), and our practices for collecting, using, maintaining, protecting, and disclosing that information. Our Services are intended for U.S. residents only.

This policy applies to information we collect related to:

- Our Services
- Emails, texts, and other electronic messages between you and our Services.
- Your interaction with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.
- Former, current, and prospective clients, brokers, independent agents, and customers.
- Other individuals who use our Services, whose personal information we receive related to the Services, or who otherwise interact or communicate with us related to our Services or our business.

Our collection, use, disclosure, and processing of personal information about individuals will vary depending upon the circumstances. This Privacy Policy is intended to describe our overall privacy and data protection practices.

This Privacy Policy does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by us or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or through the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using our Services, you agree to this privacy policy. This policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## **Children Under the Age of 13**

Our Services are not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or through any of its features, register on the Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [legal@voro.com](mailto:legal@voro.com).

## **Information We Collect About You and How We Collect It**

We collect several types of information from and about users relating to accessing and using our Services, including information:

- By which you may be personally identified, such as name, postal address, email address, telephone number, username, information you

provide in messages to us, or any other identifier by which you may be contacted online or offline (“personal information”);

- About your real estate searches and preferences, whether you plan on buying or selling real estate, home search criteria, information about financing for the purchase of real estate, and other information related to the purchase or sale of real estate; and/or
- About your internet connection, the equipment you use to access our Services, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, device type, screen resolution, operating system, browser type and version, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners.

## **Information You Provide to Us**

The information we collect on or through our Services may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering for an account to use our Website or requesting further Services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Services.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Your search queries on the Website.

## **Information We Collect Through Automatic Data Collection Technologies**

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your use of our Services, including traffic data, logs, and other communication data and the resources that you access and use on the Services.
- Information about your computer and internet connection, including your IP address, device type, operating system, and browser type and version.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). For information on how you can opt out of behavioral tracking on the Services and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking, please visit:

[www.google.com/analytics](http://www.google.com/analytics) (Google Analytics)

[www.facebook.com/about/privacy](http://www.facebook.com/about/privacy) (Facebook)

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Services and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Services according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Services.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). Cookies are text files with small pieces of data that a website stores on the hard drive of your computer. We may use cookies to make it easier for you to navigate our Services. To the extent we provide a log-in portal or related feature on our Services, cookies may be used to store passwords so that you don't have to enter it more than once. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Services.
- Web Beacons. Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- Flash Cookies. Certain features of our Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see [Choices About How We Use and Disclose Your Information](#).

## **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on our Services are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Services. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online

services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

## **Information We Collect from Third Parties**

We may collect or receive personal information about you and your property from third party sources, such as public databases, social media platforms (including from people with whom you are friends or otherwise connected), and third parties. For example:

- [Social media](#). If you choose to link, create, or log in to your Services account with a social media service (e.g., Facebook), or if you engage with a separate app or website that communicates with the Services (e.g., Google), we may receive personal information about you or your connections from that service. In many cases you can control what personal information you share with us through privacy settings available on those third-party social media services.
- [Property records](#). We may collect information about individuals and real estate property through public databases, such as property ownership and tax records maintained by state, local and county agencies.

## **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Services and our Website (and its contents) to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Data will not be shared with third parties for marketing or promotional purposes. We may use your information to contact you about our own and third parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile or contact us at [legal@voro.com](mailto:legal@voro.com). For more information, see [Choices About How We Use and Disclose Your Information](#).

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

## **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business, such as hosting providers, auditors, advisors, consultants, and customer and service providers.
- To our associated agents in connection with the agent's provision of services to you related to the sale, purchase, or lease of real estate and the advertising and marketing of real estate.

- To third parties in order to provide our Services, respond to or carry out your requests, and/or with your consent, including to:
  - Third parties to provide you a service you requested through a partnership or promotional offering made by a third party or us.
  - Third parties with whom you choose to let us share information, for example other apps or websites that integrate with the Services, or those with Services with which we integrate.
  - Third parties we work with to provide you with more personalized content and ads, and to track the effectiveness of campaigns.
- To a buyer or other successor in the event of 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 Services users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our [Terms of Use](#) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:



- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of our Website or Services may then be inaccessible or not function properly or as intended.
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by us to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to [legal@voro.com](mailto:legal@voro.com). If we have sent you a promotional email, you may click on the "Unsubscribe" link located at the bottom of such promotional email and follow the instructions.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by sending us an email stating your request to [legal@voro.com](mailto:legal@voro.com). For this opt-out to function, you must have your browser set to accept all browser cookies.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Residents of certain states, such as California, Nevada, Colorado, Connecticut, Virginia, and Utah may have additional personal information rights and choices. Please see [Your State Privacy Rights](#) for more information.

## **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at [legal@voro.com](mailto:legal@voro.com) to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we

believe the change would violate any law or legal requirement or cause the information to be incorrect.

Residents of certain states, such as California, Nevada, Colorado, Virginia, and Utah may have additional personal information rights and choices. Please see [Your State Privacy Rights](#) for more information.

## **Your State Privacy Rights**

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents' privacy rights, visit [Privacy Notice for California Residents](#).

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights, or to appeal a decision regarding a consumer rights request please send us an email with your request to [legal@voro.com](mailto:legal@voro.com).

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to [legal@voro.com](mailto:legal@voro.com) with the subject line "Nevada Do Not Sell Request". However, please know we do not currently sell data triggering that statute's opt-out requirements.

## **Third Party Websites**

The Services may contain links to unaffiliated third-party services. We do not own, operate, or control the websites of such third parties. Accordingly, this privacy policy does not apply to any services maintained or operated by third parties. When you click on those links, you will go to a third-party website where you will be subject to that service's privacy policy or similar statement and terms of use, and we encourage you to read that policy statement. We are not responsible for the privacy practices of other services, and we expressly disclaim any liability for their actions, including actions related to the use and disclosure of personal information by those third parties.

## **Data Security**

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure, and no security measure is ever perfect or impenetrable. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

## **Changes to Our Privacy Policy**

We may amend this policy at any time. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website. The date the privacy policy was last revised is identified at the top of the page. Where required by law to do so, we may seek your prior consent to any material changes we make to this privacy policy. You are

responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

## **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, please contact us at VORO, Attn: [legal@voro.com](mailto:legal@voro.com).