

PRIVACY POLICY

EWM Realty International values you as a customer. We want to address any privacy concerns you may have. To that end, we have set forth our privacy policy for handling the information you share with us online and through any documentation submitted as part of a real estate transaction with EWM Realty International. We want your decision to do business with us to be an informed one. We have adopted this Privacy Policy to explain what information may be collected when you utilize our applications and services, how we use this information, and under what circumstances we may disclose the information to affiliates and third parties. You should review this Privacy Policy frequently, as it may change from time to time without notice. Any changes will be effective immediately upon the posting of the revised Privacy Policy.

1. Collecting Information

When you visit our consumer application, purchase, sell or lease real estate with EWM Realty International, we may collect information about you that you share with us. We typically collect two kinds of information about you through our applications and real estate services: (a) information that you provide that personally identifies and allows us or our agents to make contact with you; and (b) information that does not personally identify you, which we automatically collect when you visit our applications or that you provide to us.

- a. **Personally Identifiable Information (“PII”)**: This identification information may include, but is not limited to, your name, physical address (including zip code), email address, telephone, mobile and fax numbers, details of your real estate, lending, title and insurance needs and references, and other details of your life that allows us to contact you in person or online.
- b. **Non-Personally Identifiable Information (“Non-PII”)**: Our definition of Non-PII is any information that does not personally identify you. Non-PII can include certain PII that has been de-identified; that is, information that has been rendered anonymous by a de-identification process. We obtain Non-PII about you from information that you affirmatively provide to us, either separately or together with your PII. We also automatically collect certain Non-PII from you when you access any applications. This information can include, among other things, IP addresses, the type of browser you are using, the third-party website from which your visit originated, the operating system you are using, the domain name of your Internet service provider, the search terms you use on our applications, the specific web pages you visit, the duration and frequency of your visits, and location information.
- c. **Cookies, Web Beacons and other Tracking Technologies**: As you may be aware, it is a common practice that when you visit our consumer applications, we may collect data through the use of cookies, web beacons or other tracking technologies (i.e. small text files placed on your computer by consumer applications), web server logs, and other web tools. This technology allows us to customize your online experience as well as track your

use of our system so that we can improve your experience. The tracking data we collect may include, but is not limited to, the date, time and location of your visit, the time you spend, the web pages you view, the other consumer applications you visit, your search queries, and basic information about your computer, such as your Internet Protocol (“IP”) address, your domain name, your browser type, and the name of your internet service provider. By continuing to browse our site, you are agreeing to our use of cookies, including for advertising and targeting purposes. Most web browsers automatically accept cookies, but those browsers will also provide controls that allow you to block or delete them. Instructions for blocking or deleting cookies are generally available in your browser's privacy or help documentation. If you choose to delete cookies, some settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated. You may deactivate cookies if you do not want your browsing to be tracked.

When visiting our consumer-facing applications, you may be directed, through hyperlinks, to other consumer applications that are beyond our control. This Privacy Policy does not cover the collection of information by those other companies and consumer applications. Although we encourage third parties to provide their own privacy policies, we are not responsible for their activities, such as how they handle the information they collect online.

2. How We Use & Share Information Collected

a. **PII:** We primarily use the PII you voluntarily share with us to:

- Customize your online and/or real estate transaction experiences and to carry out your online requests, including requests to communicate with you regarding your real estate sales and leasing needs. By registering via this Website, you are giving us and our agents permission to contact you using the PII you provide us;
- Tell you about our products, services and other offerings;
- Contact you for a variety of reasons, such as providing you promotional or marketing information for our products or those of our affiliated companies, Columbia Title of Florida, Inc. and Prosperity Home Mortgage, LLC;
- Communicate with you about your real estate transaction;
- In certain instances, we may also share your PII with our third-party vendors and marketing partners that, among other activities: perform functions on our behalf (or on behalf of our affiliated companies); administer our offerings; provide us marketing or promotional assistance; analyze our data; assist us with customer service; and offer other services and products that may be relevant to the purchase or sale of real estate. Our vendors agree to use this information, and we share information with them, only to carry out our requests.;
- On occasion, we use your PII to validate your identity;
- As for usage tracking data, we primarily use that information to operate and improve our consumer applications, and to further our marketing efforts.

You may opt-out from receiving future promotional or marketing information from us, our affiliated companies, and our third-party vendors, or direct that we not share your information with any affiliated companies or third-party vendors, as set forth below in Section 7. Except as provided in this Privacy Policy, our Terms of Use, or as set forth when you submit the information, your PII will not be sold to any third parties or used in any manner outside the scope of this Privacy Policy without your prior approval. We further reserve the right to disclose your information under limited circumstances, such as to cooperate with law enforcement or judicial authorities as required by law or legal process, to protect our own legal rights, or to protect the public good.

- b. **Non-PII:** We use Non-PII in a variety of ways, including to:
- Help analyze site traffic, understand customer needs and trends;
 - Carry out targeted promotional activities; and
 - Improve our services and offerings.

We may use your Non-PII by itself or aggregate it with information we have obtained from others. We may share your Non-PII with our affiliated companies and third parties to achieve these objectives and others, but remember that aggregate information is anonymous information that does not personally identify you.

Whenever you are online or on our applications, you run the risk that the information you provide will fall into the wrong hands. Although we implement and maintain commercially reasonable security procedures and practices to safeguard your privacy, we cannot guarantee the security of any information you provide to us. We accept no responsibility or liability for the activities of third parties. By using our consumer applications and applications, you agree to our Terms of Use.

3. Updating Information

If you would like to review the information about you that we have collected through our consumer applications, or to change that information, you can make that request by following the procedure indicated below in Section 7. We may require that you verify your identity before we process your request.

4. Processing Location

We process your personal information in the United States. For users located outside of the United States, please see Sections 10 and 11 titled International Users and European Union Residents and General Data Protection Regulation Information for more detailed information.

5. Anti-Fraud Disclosure

Electronic communications such as email, text messages and social media messaging, are neither secure nor confidential. While EWM Realty International has adopted policies and procedures to aid in avoiding fraud, including on-line cyber-fraud and cyber-crime, even the

best security protections can still be bypassed by unauthorized parties. EWM Realty International will never send you any electronic communication with instructions to transfer funds or to provide nonpublic personal information, such as credit card or debit numbers or bank account and/or routing numbers.

YOU SHOULD NEVER TRANSMIT NONPUBLIC PERSONAL INFORMATION, SUCH AS CREDIT OR DEBIT CARD NUMBERS OR BANK ACCOUNT OR ROUTING NUMBERS, BY EMAIL OR OTHER UNSECURED ELECTRONIC COMMUNICATION. EMAILS ATTEMPTING TO INDUCE FRAUDULENT WIRE TRANSFERS ARE COMMON AND MAY APPEAR TO COME FROM A TRUSTED SOURCE.

If you receive any electronic communication directing you to transfer funds or provide nonpublic personal information, EVEN IF SUCH COMMUNICATION APPEARS TO BE FROM EWM Realty International, its agents or affiliates, DO NOT RESPOND. Immediately contact your real estate agent or title closer directly at a phone number that you independently verify--not the phone number in the request. Such requests, even if they may otherwise appear to be from EWM Realty International are likely part of a scheme to defraud you by stealing funds from you or using your identity to commit a crime.

To notify EWM of suspected fraud related to your real estate transaction, send an email to fraud@ewm.com.

6. Updating Our Privacy Policy

We may, from time to time, change our Privacy Policy. We will notify you of any changes by posting our updated Privacy Policy on our consumer applications and inserting a new "Effective Date."

7. Contacting & Opt-Out Information

You may contact EWM Realty International at privacy@ewm.com, if: (a) you have questions or comments about our Privacy Policy; (b) wish to make corrections to any personally identifiable information you have provided; (c) want to opt-out from receiving future commercial correspondence, including emails, from us, our affiliated companies or third parties; or (d) wish to withdraw your consent to sharing your personally identifiable information with others.

We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Please note that requests may take up to 30 days and we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our services.

8. California Privacy Rights

Under California law, California residents have the right to request in writing from businesses with whom they have an established business relationship, the following: (1) a list of categories of personal information, such as name, address, e-mail address, and the type of

services provided to the customer, that a business has disclosed to third parties, including EWM's affiliated title company, Columbia Title of Florida, Inc. or mortgage company, Prosperity Home Mortgage, LLC, the immediately preceding calendar year for the third parties' direct marketing purposes and (2) the names and addresses of all such third parties.

To request the above information please contact us by writing to: privacy@ewm.com.

9. Children's Privacy

EWM Realty International does not knowingly intend to collect personally identifiable information from children under 13 years of age. If a child has provided us with personally identifiable information a parent or guardian of that child may contact us at the phone number or mailing address listed in paragraph 12 if they want this information deleted from our records. We will then make reasonable efforts to delete the child's information from our database.

10. International Users

Our consumer applications are hosted by servers in the United States. If you are located outside of the United States, your personal information may be transferred to the United States. By submitting your personal information, you consent to its transfer to the United States and to its storage, processing, and use there in accordance with this Privacy Policy.

11. European Union Residents and General Data Protection Regulation Information

In the event that the General Data Protection Regulation "GDPR" (a privacy law applicable to consumers residing in the European Economic Union) is applicable to a specific transaction and/or a specific consumer, any such consumer has the below rights.

(a) Right of access. You have the right to obtain from us confirmation as to whether or not Personal Information concerning you is processed, and to request access to the Personal Information.

(b) Right to correct or update. You have the right to correct or update inaccurate Personal Information about you.

(c) Right to restrict processing. Under certain circumstances, you have the right to restrict the processing of your Personal Information. In such instances, your Personal Information may only be processed by us for limited purposes.

(d) Right to object. Under certain circumstances, you have the right to object to the use or processing of your Personal Information where we no longer have a legitimate or legal need to process it; to object to your Personal Information being processed for direct marketing purposes; and object to automated decision making (including profiling) where the decision would have a legal or similarly significant impact on you.

(e) Right to data portability. Under certain circumstances, you have a right to receive a copy of your Personal Information, which you have provided to us, in a machine-readable format and the right to transmit that Personal Information for use in another party's service.

(f) Right to be forgotten. Under certain circumstances, you have the right to request that your Personal Information be erased. Some Personal Information may be in backup archives and/or must be retained for legal or compliance reasons.

To make any of these requests, please follow the instructions outlined in Section 7. We may require that you verify your identity to the exercise of any of these rights. Under certain circumstances, and in the event of a data breach involving your Personal Information that is likely to result in a risk to your rights and freedoms, we are required to notify the applicable supervisory authority within 72 hours after becoming aware of such a breach.

If you have been referred to EWM Realty International by a third party corporate client or a relocation services company, EWM Realty International is acting as a "Data Processor" under the direction of such corporate client or relocation services company, which are deemed "Data Controllers" under GDPR. The Data Controller is responsible for telling EWM Realty International how your Personal Information should be used or processed in those specific transactions.

12. Effective Date and Contact Information:

This Privacy Policy is effective as of February 1, 2019. EWM Realty International can be reached at our mailing address: 201 Alhambra Circle, Suite 1060, Coral Gables, FL 33134; Telephone Number: 305-960-2500 or by Email at: privacy@ewm.com.