

GiveReferrals, Inc. Privacy Policy

1. INTRODUCTION

This Privacy Policy describes how GiveReferrals, Inc. (“Company,” “we,” “us,” or “our”) collects, uses, shares, and protects information when you use our website, mobile applications, and related services (collectively, the “Platform”) that facilitate connections between real estate professionals for lead referral purposes. By accessing or using our Platform, you acknowledge that you have read this Privacy Policy, and you understand that by continuing to use the Platform you are accepting the terms of this Privacy Policy.

2. INFORMATION WE COLLECT

2.1 Personal Information

We may collect various types of personal information, including your name, email address, phone number, and mailing address. Additionally, while we do not verify the real estate license information that users submit to their profiles, we collect that submitted information. This information includes license numbers, the state in which the user holds the license, and the status of the license, along with professional information including brokerage affiliation, specialties, and experience level. We also gather social media profiles and professional networking information. Furthermore, we may collect photos and biographical information for agent profiles, as well as communication preferences and marketing consent agreements.

We use collected information to facilitate connections between referring and receiving agents and process lead referrals. Additionally, we utilize this information to provide customer support and platform assistance, improve our services, develop new features, and send transactional and marketing communications. We also conduct analytics and market research, ensure platform security, prevent fraud, comply with legal and regulatory requirements, resolve disputes, enforce our terms of service, and customize user experience and content recommendations.

2.2 Usage and Technical Information

We may collect technical and usage information including IP addresses, device identifiers, and browser information. This encompasses usage patterns, page views, feature interactions, precise geolocation data (only with your explicit permission) for geographic matching, cookies, pixel tags, and similar tracking technologies. We also gather search queries, platform navigation history, performance analytics, error logs, mobile device information, and app usage data.

2.3 Third-Party Information

We may receive information from various external sources, including Multiple Listing Services (MLS), real estate databases, public records, property information services, social media platforms, and professional networks. Additional sources include background check,

verification services (used in compliance with the Fair Credit Reporting Act), marketing partners, lead generation services, credit reporting agencies, and financial institutions (when you authorize such access).

3. HOW WE USE YOUR INFORMATION

We use collected information to facilitate connections between referring and receiving agents and process lead referrals. Additionally, we utilize this information to provide customer support and platform assistance, improve our services, develop new features, send transactional communications and, with your consent, marketing communications. We also conduct analytics, market research, ensure platform security, prevent fraud, comply with legal and regulatory requirements, resolve disputes, enforce our terms of service, and customize user experience and content recommendations.

3.1 Legal Basis for Processing

We process your personal information based on the following legal grounds under applicable privacy laws:

Legitimate Interests: We process most information based on our legitimate business interests, including facilitating lead referrals between real estate professionals, maintaining platform security, preventing fraud, improving our services, and conducting business analytics. We have conducted balancing assessments to ensure our legitimate interests do not override your fundamental rights and freedoms. Note that U.S. privacy laws may not recognize “legitimate interests” as a legal basis for processing; we rely on other legal bases such as consent or contract performance where required by applicable federal and state privacy laws.

Contract Performance: We process information necessary to provide our referral services, maintain your account, process payments, and fulfill our contractual obligations to platform users.

Consent: We process information for marketing communications, certain analytics, and optional features based on your explicit consent. You may withdraw consent at any time through your account settings or by contacting us.

Legal Obligation: We process information when required by applicable laws and regulations, including real estate licensing requirements, anti-money laundering obligations, tax reporting, and compliance with court orders or government investigations.

Vital Interests: In rare circumstances, we may process information to protect someone’s life or physical safety.

3.2 Automated Decision-Making and Profiling

Our Platform uses automated systems and algorithms for certain processing activities, including lead matching and routing, agent performance evaluation and scoring (which may affect your visibility and opportunities on the Platform), fraud detection and prevention, platform personalization and recommendations, and quality assessment of referrals and agents.

When we use automated decision-making that significantly affects you, where required by applicable law, you have the right to request human intervention, express your point of view, and contest the decision. You may also request information about the logic involved in automated processing, subject to our proprietary business information protections, and opt out of certain automated processing activities through your account settings when technically feasible.

We collect comprehensive information related to real estate leads and transactions, including prospective client contact information and preferences, detailed property information such as addresses, values, and transaction types, and lead source and referral tracking information. We also maintain communication records between agents and clients, transaction status and outcome data, and geographic service areas and market preferences.

4. INFORMATION SHARING AND DISCLOSURE

4.1 Between Platform Users

When you use the Platform to make or receive lead referrals, we facilitate the sharing of information between referring agents and receiving agents to enable successful real estate transactions. The specific information shared includes:

Information Shared with Receiving Agents: When a referring agent submits a lead through the Platform, we share prospective client contact information (including name, email, phone number, and preferred contact methods), property details and transaction information (including location, property type, price range, and transaction timeline), client preferences and requirements, geographic location and market area, lead source information, and any additional context or notes provided by the referring agent.

Information Shared with Referring Agents: Receiving agents' information shared with referring agents includes professional profile information (name, brokerage affiliation, license information, specialties, and service areas), performance metrics and ratings,

contact information for communication about the referral, and transaction status updates and outcome information for lead-tracking purposes.

Mutual Visibility: Both referring and receiving agents may view communication history related to specific referrals, transaction progress and milestone updates, and feedback and

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ratings related to the referral relationship.

By using the Platform to submit leads, referring agents represent and warrant that they have obtained all necessary consents from their clients to share information through the Platform as described in this Privacy Policy. All platform users remain responsible for compliance with applicable real estate licensing laws, professional obligations, and privacy regulations in their respective jurisdictions. We are not responsible for how individual agents use or further disclose information received through the Platform outside of our services.

4.2 Service Providers and Partners

We may share information with third-party service providers who perform services on our behalf, including payment processors, financial institutions, cloud storage and hosting providers, analytics and marketing service providers, identity verification and background check services (which may constitute consumer reporting agencies under FCRA), legal and compliance consultants, customer support and communication platforms, and lead generation and marketing partners. These service providers are contractually obligated to use your information only for the purposes of providing services to us and to maintain appropriate security measures.

4.3 International Data Transfers

Information may be transferred to and processed in countries other than your country of residence, including the United States and other countries where our service providers operate. We implement appropriate safeguards to protect your information during international transfers.

When transferring personal information from the European Economic Area, United Kingdom, or Switzerland, we rely on adequacy decisions by relevant authorities where available or implement appropriate safeguards such as Standard Contractual Clauses approved by the European Commission, Binding Corporate Rules, or other legally recognized transfer mechanisms.

For transfers to countries without adequacy decisions, we conduct Transfer Impact Assessments to evaluate the level of protection and implement additional safeguards as necessary, including technical measures such as encryption, contractual protections with

recipients, and ongoing monitoring of transfer conditions.

You may request information about the specific safeguards we use for international transfers by contacting us using the information provided in the Contact Information section.

4.4 Aggregate and De-identified Data

We may share aggregate, de-identified, or anonymized data that cannot reasonably be used to identify you for market research and industry analysis, business development and partnership opportunities, academic research and public policy discussions, and product improvement and feature development. We take reasonable measures to ensure that such data cannot be re-identified.

5. DATA RETENTION

We retain information for as long as necessary to provide our services and maintain user accounts, comply with legal and regulatory requirements, resolve disputes, enforce agreements, maintain business records and transaction history, and support ongoing business relationships.

Specific retention periods include maintaining active user accounts for the duration of membership plus seven years, retaining transaction records for ten years or as required by applicable law, preserving communication records for five years from last interaction, keeping marketing data until consent is withdrawn or after three years of inactivity, and maintaining technical logs for twenty-four months unless required for security or legal purposes.

6. DATA SECURITY

We implement reasonable security measures including encryption of data in transit and at rest, multi-factor authentication for sensitive accounts, regular security assessments and vulnerability testing, employee training, access controls, incident response, breach notification procedures, and third-party security audits and certifications.

However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

We comply with applicable privacy laws and regulations, including the California Consumer Privacy Act (CCPA), Virginia Consumer Data Protection Act (VCDPA), Colorado Privacy Act (CPA), General Data Protection Regulation (GDPR) where applicable, Real Estate Settlement Procedures Act (RESPA), Fair Credit Reporting Act (FCRA) where applicable, and state real estate licensing and privacy requirements.

7. YOUR PRIVACY RIGHTS

7.1 Access and Correction

You may access and review your personal information, correct inaccurate or outdated information, update your profile and preferences, and request copies of your data. **7.2**

Marketing Communications

You may opt out of marketing emails and communications, adjust communication preferences in your account settings, unsubscribe from specific types of messages, and request removal from marketing lists.

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7.3 Account Management

You may deactivate or delete your account, limit information sharing with other users, adjust privacy settings and visibility preferences, and export your data before account closure.

7.4 State-Specific Rights

Depending on your location, you may have additional rights, including the right to know what personal information is collected, the right to delete personal information, the right to opt out of sale of personal information, the right to non-discrimination for exercising privacy rights, and the right to data portability and correction.

7.5 Complaints and Enforcement

If you believe we have not adequately addressed your privacy concerns or have violated applicable privacy laws, you have the right to lodge a complaint with the relevant supervisory authority in your jurisdiction. For EU residents, you may contact your local data protection authority. For California residents, you may contact the California Attorney General's office. For residents of other states with privacy laws, please contact the appropriate state authority.

You may also file complaints with industry regulatory bodies such as state real estate commissions if your concerns relate to real estate professional conduct on our Platform. Before filing a complaint with authorities, we encourage you to contact us directly so we can address your concerns promptly and effectively.

We comply with applicable privacy laws and regulations, including the California Consumer Privacy Act (CCPA), Virginia Consumer Data Protection Act (VCDPA), Colorado Privacy Act (CPA), General Data Protection Regulation (GDPR) where applicable, Real Estate Settlement Procedures Act (RESPA), Fair Credit Reporting Act (FCRA) where applicable, and state real estate licensing and privacy requirements.

8. COOKIES AND TRACKING TECHNOLOGIES

We use cookies, web beacons, and similar technologies to remember your preferences and settings, authenticate users, prevent fraud, analyze platform usage and performance, deliver targeted advertising and content, enable social media features and integrations,

and provide customer support and assistance.

You can control cookies through your browser settings, but this may affect platform functionality.

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9. THIRD-PARTY SERVICES AND LINKS

Our Platform may integrate with or link to third-party services, including social media platforms, payment processors, mapping and location services, analytics providers, and real estate databases and MLS systems.

These third parties have their own privacy policies, and we are not responsible for their practices.

10. INTERNATIONAL DATA TRANSFERS

Information may be transferred to and processed in countries other than your country of residence. We implement appropriate safeguards to protect your information during international transfers.

11. CHILDREN'S PRIVACY

Our Platform is not intended for children under 16 years of age. We do not knowingly collect personal information from children under 16. If we learn we have collected such information, we will delete it promptly.

12. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy periodically. We will notify you of material changes through email notifications to registered users, prominent notices on our Platform, and updated effective dates and version numbers. Continued use of our Platform after changes constitutes acceptance of the updated Privacy Policy.

13. REGULATORY COMPLIANCE

We comply with applicable privacy laws and regulations, including the California Consumer Privacy Act (CCPA), Virginia Consumer Data Protection Act (VCDPA), Colorado Privacy Act (CPA), General Data Protection Regulation (GDPR) where applicable, Real Estate Settlement Procedures Act (RESPA), Fair Credit Reporting Act (FCRA) where applicable, and state real estate licensing and privacy requirements.

13.1 Real Estate Industry Compliance

As a platform serving real estate professionals, we adhere to industry-specific standards and requirements including Multiple Listing Service (MLS) data usage rules and restrictions, state real estate commission guidelines and regulations, National Association of REALTORS® Code of Ethics where applicable, Interstate Land Sales Full Disclosure

Act requirements, and state-specific real estate advertising and lead handling regulations.

Real estate agents using our Platform must comply with their own professional licensing requirements, ethical obligations, and applicable state and federal laws governing real estate transactions and client relationships.

13.2 Cross-Border Compliance

For international users and cross-border referrals, we implement appropriate compliance measures for applicable international privacy and real estate regulations, maintaining awareness of varying requirements across different jurisdictions where our users operate.

This Privacy Policy is designed to be comprehensive and may include provisions that do not apply to all users or situations. Specific rights and obligations may vary based on your location, professional status, and the nature of your use of our Platform. We regularly review and update our compliance practices to reflect changes in applicable laws and industry standards.

14. CONTACT INFORMATION

For questions about this Privacy Policy or to exercise your rights, contact us at: GiveReferrals, Inc.

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