

# OPULENCE REALTY GROUP PRIVACY POLICY

*LAST UPDATED: July 13, 2021*

Opulence Realty Group, LLC. and its affiliates all of which are based in the United States (collectively, "**Opulence Realty Group**," "**we**," or "**us**"), want you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect about consumers ("**you**") through:

- Our website at <https://opulencerealtors.com/> and Opulence Realty Group-branded web-based applications we operate from which you are accessing this Privacy Policy (collectively, the "**Opulence Realty Group Websites**"),
- HTML-formatted email messages that we send to you that link to this Privacy Policy, and
- Offline interactions you have with us.

Collectively, we refer to the Opulence Realty Group Website, our emails, and offline interactions as the "**Services**."

## **Personal Information**

"**Personal Information**" is information that identifies you as an individual or relates to an identifiable individual. We collect Personal Information including:

- Name
- Postal and email address
- Telephone number
- IP address (we may also derive your approximate location from your IP address)
- Your real estate buying/selling interests, when you choose to share them with us
- Your mobile device's contacts, photos, and location, when you choose to share them with us
- Photos

## **Collection of Personal Information**

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Services**
  - We collect Personal Information through the Services, for example, when you fill out our contact form when using our Services, register an account to access the Services, or contact us by telephone.
- **From Other Sources**
  - We receive your Personal Information from other sources, for example:
    - publicly available databases;

- joint marketing partners when they share the information with us.

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people, such as your friends or family, to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

### **Use of Personal Information**

We and our service providers use Personal Information for legitimate business purposes including:

- **Providing the functionality of the Services and fulfilling your requests.**
  - To provide the Services' functionality to you, such as arranging access to your registered account and providing you with related user support services.
  - To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions or comments, or when you request other information about our Services.
  - To send administrative information to you, such as changes to our terms, conditions, and policies.
  - To allow you to send messages to another person through the Services if you choose to do so.

We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

- **Providing you with marketing materials and facilitating social sharing**
  - To send you marketing related emails with information about our services, new products, and other news about our company.
  - To facilitate social sharing functionality that you choose to use.
  - We will engage in this activity with your consent or where we have a legitimate interest.
- **Analysis of Personal Information for business reporting and providing personalized services.**
  - To better understand your interests and preferences, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests.
  - To better understand your preferences so that we can deliver content via our Services that we believe will be relevant and interesting to you.

We use this information to manage our contractual relationship with you.

- **Accomplishing our business purposes.**
  - For data analysis, for example, to improve the efficiency of our Services;
  - For audits, to verify that our internal processes function as intended and to address legal, regulatory or contractual requirements;
  - For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;
  - For developing new products and services;
  - For enhancing, improving, or modifying our current products and services;
  - For identifying usage trends, for example, understanding which parts of our Services are of most interest to users;
  - For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users; and
  - For operating and expanding our business activities, for example, understanding which parts of our Services are of most interest to our users so we can focus our energies on meeting our users' interests.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interests.

## **Disclosure of Personal Information**

We disclose Personal Information:

- **To our affiliates for the purposes described in this Privacy Policy.**
- **To our third party service providers, to facilitate services they provide to us.**
  - These can include providers of services such as data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, user support service, email delivery, auditing, and other services.
- **To our Opulence Realty Group agents, brokers, and market centers where you have requested such sharing or inquired about a property.**
- **By using the Services, you may elect to disclose Personal Information.**
  - On message boards, chat, blogs, and other services to which you are able to post information and content. Please note that any information you post or disclose through these services will become public and may be available to other users and the general public.

## **Other Uses and Disclosures**

We also use and disclose your Personal Information as necessary or appropriate, in particular when we have a legal obligation or legitimate interest to do so:

- **To cooperate with public and government authorities.**
  - To respond to a request or to provide information we believe is important.
- **To cooperate with law enforcement.**
  - For example, when we respond to law enforcement requests and orders or provide information, we believe is necessary or appropriate.
- **For other legal reasons.**
  - To enforce our terms and conditions; and
  - To protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others.
- **In connection with a sale or business transaction.**
  - We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

## OTHER INFORMATION

“Other Information” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. The Services collect Other Information such as:

- Browser and device information
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you that does not reveal your specific identity

### Collection of Other Information

We and our service providers may collect Other Information in a variety of ways, including:

- **Through your browser or device**
  - Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services. We use this information to ensure that the Services function properly.
- **Using cookies**
  - Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your

experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services. We may also use cookies or other technologies in online advertising to track responses to our ads. We do not currently respond to browser do-not-track signals. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. You may also wish to refer to <https://www.allaboutcookies.org/>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

- **Using pixel tags and other similar technologies**
- **Pixel tags.** Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.

## Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Policy.

## Security

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that there is a security vulnerability in the Services, please immediately notify us in accordance with the “*Contacting Us*” section below. Please allow us to investigate and resolve any security vulnerability you report to us before you disclose it publicly. These vulnerabilities are a high priority for OPR, and we will investigate and fix vulnerabilities in accordance with our commitment to privacy and security. If you report a security vulnerability to OPR, please provide the following details along with any other information that will help us resolve the issue:

- A description of the vulnerability.
- A description of your environment (e.g., your type of browser and version, operating system, device model, and the Service(s) you are using).

- Any applicable screenshots.

## Choices and Access

### Your choices regarding our use and disclosure of your Personal Information

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt-out from:

- **Receiving marketing-related emails from us:** If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt out
- **Our sharing of your Personal Information with our affiliates for their direct marketing purposes:** If you would prefer that we discontinue sharing your Personal Information on a going-forward basis with our affiliates for their direct marketing purposes, you may opt out.
- **Our sharing of your Personal Information with our third-party business partners for their direct marketing purposes:** If you would prefer that we discontinue sharing your Personal Information on a going-forward basis with our business partners for their direct marketing purposes, you may opt out.

**TO OPT OUT**– Please contact us at [support@opulencerealtors.com](mailto:support@opulencerealtors.com) for assistance with the above. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

### How you can access, change, or delete your Personal Information

If you would like to request to review, correct, update, suppress, restrict or delete Personal Information, object to the processing of Personal Information, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may update your information by emailing us at [support@opulencerealtors.com](mailto:support@opulencerealtors.com). We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g.,

when you make a purchase, you may not be able to change or delete the Personal Information provided until after the completion of such purchase).

Please note that your request does not ensure complete or comprehensive removal of the content or information, as, for example, some of your content may have been reposted by another user.

## **Retention Period**

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services).
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

## **Third Party Services**

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Apple, Google, Microsoft, RIM or any other app developer, app provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Services.

Specifically, any use of information received from Google APIs will adhere to the [Google API Services User Data Policy](#), including the Limited Use requirements.

## **Use of Services by Minors**

The Services are not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under 16.

### **Sensitive Information**

Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through the Services or otherwise to us.

### **Updates to this Privacy Policy**

The "*Last Updated*" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services. Your use of the Services following these changes means that you accept the revised Privacy Policy.

### **Contacting Us**

Opulence Realty Group LLC, located at 500 N. Franklin Turnpike, Suite 303A, Ramsey NJ 07446 USA, is the company responsible for collection, use and disclosure of your Personal Information under this Privacy Policy.

If you have any questions about this Privacy Policy, please contact us at [support@opulencerealtors.com](mailto:support@opulencerealtors.com):

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

### **Sources of Personal Information**

We collect Personal Information from:

- Our interactions with you, such as when you use our websites or applications, contact us online or on the phone, register an account, purchase a service, or attend one of our events.

### **Categories of Personal Information Collected**

We may collect, and may have collected within the preceding 12 months, the following categories of Personal Information:

Category A. Identifiers, such as name, contact information, IP address and other online identifiers;



Category B. Personal information, such as name, contact information, payment card number, financial information, employment information, insurance information, and government-issued ID numbers;

Category C. Characteristics of protected classifications under California or federal law, such as marital status;

Category D. Commercial information, such as transaction information and purchase history;

Category F. Internet or network activity information, such as browsing history and interactions with our website;

Category H Geolocation data, such as device location;

Category G. Professional or employment-related information; and

Category K. Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

### **Use of Personal Information**

- We use these categories of Personal Information for the purposes of operating, managing, and maintaining our business, providing our products and services, and accomplishing our business purposes and objectives, including using Personal Information to:
  - Fulfill your requests, respond to your inquiries, and process your transactions.
  - Provide, develop, improve, repair, and maintain our services.
  - Provide tools and services to our franchisees and agents.
  - Personalize, advertise, and market our products and services.
  - Conduct research, analytics, and data analysis.
  - Maintain our property and our records and undertake quality and safety assurance measures.
  - Conduct risk and security control and monitoring and detect and prevent fraud.
  - Perform identity verification, accounting, audit, and other internal functions, such as internal investigations and record-keeping.
  - Carry out corporate transactions, such as mergers, joint ventures, or acquisitions; and
  - Comply with law, legal process, and internal policies, and exercise and defend legal claims.

### **Disclosure of Personal Information**

We have disclosed the following categories of Personal Information to third parties for our operational business purposes:

Category A. Identifiers, such as name, contact information, IP address and other online identifiers.

Category B. Personal information, as defined in the California customer records law, such as name, contact information, payment card number, financial information, employment information,

Category C. Characteristics of protected classifications under California or federal law, such as marital status;

Category D. Commercial information, such as transaction information and purchase history;

Category F. Internet or network activity information, such as browsing history and interactions with our website;

Category G. Geolocation data, such as device location;

Category I Professional or employment-related information; and

Category K. Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

We have disclosed these categories of Personal Information to our affiliated entities, trusted third-party service providers, licensed franchisees, and business partners, as well as to our agents, brokers, and market centers where you have requested such sharing.