

# Privacy Policy

We respect the privacy of our users, and we are committed to protecting it through our compliance with this privacy policy (“Privacy Policy”), which describes the types of information we may collect from you or that you may provide when you use the trinityresidential.com website (“Website”), or our services (collectively, “Services”) and our practices for collecting, using, maintaining, protecting and disclosing that information. This Privacy Policy applies to the data collected by us, or those working on our behalf, through the information you enter or from the imported data from authorized and approved sources. It does not apply to data collected through offline means, or from other sites, products, or services not approved by us.

By using or accessing our Website or the Services in any manner, you acknowledge that you accept the practices and policies described in this Privacy Policy, and you hereby consent that we may collect, use, and share your information as described herein. If you do not agree with our policies and practices, your choice is not to use our Website or our Services.

## What does this Privacy Policy Cover?

This Privacy Policy applies to information we collect:

- In email, text and other electronic messages between you and us.
- When and where available, through mobile and desktop applications, which provide dedicated non-browser-based interaction between you and us.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

- Which you provide to us, such as your name and e-mail address (including by “following,” “liking,” linking your account to our Website on a third-party website or network).

If you correspond with us by email, we may retain the content of your email messages, your email address, and our responses. We may also retain any messages you send to us.

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 (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on our website.

This Privacy Policy covers our treatment of personally identifiable information. This is information which may be connected to you specifically as the individual to whom the information relates. Such information may include name, mailing address, email address, telephone number, or any other information defined as personally identifiable information (or similar term) by applicable laws (collectively, “Personal Information”). Personal Information does not include your personally identifiable information that has been deidentified, pseudonymized, anonymized, aggregated and/or otherwise processed so as to be unidentifiable (i) in such a way that the data can no longer be attributed to a specific individual, or (ii) in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (the foregoing being referred to as “De-Identified Personal Information”).

We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize and improve our services, to allow you to set up a user account and profile, to contact you and allow other users to contact you, to fulfill your requests for certain products and services, to provide and improve the Services, and to analyze how you use the Services. In certain cases, we may also share some Personal Information with third parties, but only as described below.

Please note that some of our Services may allow you to provide us with Personal Information regarding your own users, visitors, supporters or voters (“Third Party Personal Information”). This Privacy Policy deals with our use of your own Personal Information, and not Third-Party Personal Information that you may provide to us in connection with the Services.

We are not responsible for the practices of sites linked to from the Services, and you are advised to review their rules and policies before interacting with any of these sites or providing them with any private information.

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

We collect several types of information from and about users, including Personal Information that is about you but individually does not identify you, such as, time and date of visits to our Website, about your Internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- Directly from you when you provide it to us. When you sign up for the Services, you provide us with information such as your name and email address. We may also collect information from your public social media accounts.
- Automatically as you navigate through the site, information collected automatically may include usage details, 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 Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to or purchasing our services, posting material or requesting further services. We may also ask you for information when you report a problem with our Website.
- 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 Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including, but not limited to, traffic data, geolocation data, logs and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system and browser type.

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 more information on how to opt-out of advertiser tracking mechanisms, please visit [www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

The information we collect automatically is statistical data and may include Personal Information, but 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 Website and to deliver a better and more personalized service, including, but not limited to, by enabling us to:

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

The technologies we use for this automatic data collection may include cookies, flash cookies, web beacons, pixel tracking, GIF and/or IP address. Each of these is discussed below.

- **Cookies (or browser cookies):** A cookie is a small file placed on the hard drive of your computer or mobile device. It may contain certain data, including, but not limited to: the name of the server that has placed it there, an identifier in the form of a unique number, and, an expiration date (some cookies only). Cookies are managed by the

web browser on your computer (Internet Explorer, Firefox, Safari or Google Chrome). Different types of cookies which have different purposes are used on our Website.

- **Essential Cookies:** These cookies are essential to allow you to browse our Website and use its functions. Without them, services such as shopping baskets and electronic invoicing would not be able to work.
- **Performance Cookies:** These cookies collect information on the use of our Website, such as which pages are consulted most often. This information enables us to optimize our Website and simplify browsing. Performance cookies also enable our affiliates and partners to find out whether you have accessed one of our websites from their site and whether your visit has led to the use or purchase of a product or service from our Website, including the references for the product or service purchased. These cookies do not collect any information which could be used to identify you. All the information collected is aggregated, and therefore anonymous.
- **Functionality Cookies:** These cookies enable our Website to remember the choices you have made when browsing. For example, we can store your geographical location in a cookie so that the Website corresponding to your area is shown. We can also remember your preferences, such as the text size, font and other customizable aspects of the Website. Functionality cookies may also be able to keep track of the products or videos consulted to avoid repetition. The information collected by these cookies cannot be used to identify you and cannot monitor your browsing activity on sites which do not belong to us.

It is possible that you will come across third-party cookies on some pages of sites that are not under our control.

You may refuse to accept browser cookies by activating the appropriate setting in your browser. However, if you select this setting, you may be unable to access certain parts of our Website.

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 Website.

We also may use cookies to implement tracking technology on our Website. This allows us to display advertising that is tailored to you on our Website which parts of our content interest you the most and which service categories you request. This tracking uses De-Identified Personal Information data (i.e., data that cannot be identified as being specifically associated with you) and does not use your Personal Information. We will not combine this data with your other Personal Information without your express permission. At any time, you can prevent the use of cookies like this in the future. We also list our partners that are allowed to place cookies on our Website. These also provide you with the option of preventing the use of cookies in the future. For more information, contact the relevant third-party provider.

- **Flash Cookies:** Certain features of our Website may use locally 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.
- **Web Beacons:** Pages of our the 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).
- **Pixel Tracking:** In addition to using Cookies, the Website may employ “pixel tracking,” a common process which may be used in connection with advertisements on other sites. Pixel tracking involves the use of pixel tags that are not visible to the user and consist of a few lines of computer code. Pixel tracking measures the effectiveness of advertisements and compiles aggregate and specific usage statistics. A “pixel tag” is an invisible tag placed on certain pages of

websites that are used to track an individual user's activity. We may access these pixel tags to identify activity and interests that may allow us to better match our goods, services, and other offers with your interests and needs. For example, if you visit our Website from an advertisement on another website, the pixel tag will allow the advertiser to track that its advertisement brought you to the Website. If you visit our Website, and we link you to another website, we may also be able to determine that you were sent to and/or transacted with a third-party website. This data is collected for use in our marketing and research.

- **GIF:** We may use tiny images known as clear GIFs to track the behavior of users, including statistics on who opens our emails.
- **IP Address:** Our servers automatically record certain log file information reported from your browser when you access the Services. These server logs may include information such as which pages of the Service you visited, your internet protocol ("IP") address, browser type, and other information on how you interact with the Services. These log files are generally deleted after one week.

## Third-party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website 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 website. 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.

Financial information connected to payments may be collected or stored by a third-party payment processor and payment is subject to their terms and policies.

We use Google Analytics to help us understand the use of our Website. This service collects the information sent by your browser as part of a web page request, including cookies and your IP address, and their use of it is governed by their privacy policy.

## How We Use Your Information

By providing us your email address (including by “following,” “liking,” linking your account to our Website, etc., on a third-party website or network), you consent to our using the email address to send you Website-related notices, including any notices required by law, in lieu of communication by postal mail. You also agree that we may send you notifications of activity on our Website to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages, such as newsletters, changes to features of our Website, or other information. If you do not want to receive such email messages, you may opt-out using the “unsubscribe” feature in any such email.

Following termination or deactivation of your account with us, we may retain your profile information and user content for a reasonable time (not to exceed 180 days) for archival purposes. Furthermore, we may retain and continue to use indefinitely all information (including user content) contained in your communications to other users or posted to public or semi-public areas of our Website after termination or deactivation of your account.

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

- To present our Website and its contents to you.
- To provide you with information, products or services that you request from us.
- For analyzing how the Service is used, diagnosing service or technical problems, maintaining security, and personalizing content.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To operate, maintain, and provide to you the features and functionality of the Service.
- 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, our policies, terms 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.

We use cookies, clear gifs, and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; (f) help you efficiently access your information after you sign in; (h) track User Content and users to the extent necessary to comply as a service provider with the Digital Millennium Copyright Act; and (i) enhance our Website security.

We may also 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 either check the

relevant box located on the form on which we collect your data or adjust your user preferences in your account profile.

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.

## Social Media Plugins

We integrate social media application program interfaces or plug-ins ("Plug-ins") from social networks, including Facebook, Google+, LinkedIn, Xing, Twitter, Instagram, Tumblr, Pinterest and/or possibly other companies, into the Website. In order to register as a user with us, you may have the option to sign in using your Facebook or other social media site ("SMS") login.

For example, when you visit our Website or platform, the plugin creates a direct connection between your browser and the Facebook server. This allows Facebook to receive information about your visit to our Website or platform with your IP address. If you click the Facebook "Like" button while you are logged on to your Facebook account, you can link the contents of our Website or platform to your Facebook profile. This allows Facebook to assign your visit to our Website or platform to your user account. Please note that as a provider of the Website or platform, we receive no notification about the contents of the transmitted data or their use by Facebook. If you do not want Facebook to assign your visit to our Website or platform to your Facebook user account, please log out of your Facebook user account.

If you do so, you authorize us to access certain SMS account information, such as your public SMS profile (consistent with your privacy settings in SMS), your email address, interests, likes, gender, birthday, education

history, relationship interests, current city, photos, personal description, friend list, and information about and photos of your SMS friends who might be common SMS friends with other users. Plug-ins may transfer information about you to the Plug-in's respective platform without action by you. This information may include your platform user identification number, which website you are on, and more. Interacting with a Plug-in will transmit information directly to that Plug-in's social network and that information may be visible by others on that platform. Plug-ins are controlled by the respective platform's privacy policy, and not by our Privacy Policy. You can find the privacy policy for a platform on their website.

## Retention of Your Information

Following termination or deactivation of your account, we may retain your Personal Information and other data, but will maintain it as confidential according to this Privacy Policy and as required by applicable law. We have the right to delete all of your Personal Information and other data after termination of your account without notice to you.

## How We Share Your Information

Any personal information or content that you voluntarily disclose to us, such as user content, becomes available to the public, as controlled by any applicable privacy or website customization settings.

*Personal Information:* We will never rent or sell your Personal Information to others, other than as noted below under "Disclosure/Assignment of Your Personal Information". We may share your Personal Information with third parties to provide or improve the Service to you. If we do this, such third parties' use of your Personal Information will be bound by obligations of confidentiality. We may store Personal Information in locations outside our direct control (for instance, on servers or databases located or co-located with hosting providers).

Except as otherwise described in this Privacy Policy, we will not disclose Personal Information to any third party unless required to do so by law, court order, legal process, or subpoena, including to respond to any government or regulatory request, or if we believe that such action is necessary to (a) conform to the law, comply with legal process served on us or our affiliates or partners, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) to take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, to assist government enforcement agencies, or to protect the security or integrity of our site; and (c) to exercise or protect the rights, property, or personal safety of our users or others.

*De-Identified Personal Information:* We may share De-Identified Personal Information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain Services.

## Your Consent to Our Disclosure/Assignment of Your Personal Information

You consent to our disclosure of your Personal Information and other information to a potential buyer or other successor for the purpose of considering a merger, divestiture, restructuring, reorganization, dissolution, or 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 Website users is among the assets transferred. You agree to and do hereby consent to our assignment, conveyance, or transfer (whether by contract, merger or operation of law) of rights to your Personal Information and other information, with or without notice to you and without your further consent.

## Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. All personal information you provide to us is stored on our secure servers (or those of our service providers) behind firewalls. We may store, retrieve, access, and transmit your personal information in the US or in other countries. Any payment transactions will be performed using our third-party payment processors, who will use appropriate security procedures.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Website or Services, you are responsible for keeping this password confidential. You should not share your password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account. The information you share in public areas may be viewed by other users.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do try to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to us or which we obtain. Any transmission of Personal Information is at your own risk. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or used with our Services.

## Individuals under the Age of 18

We do not knowingly collect, solicit or maintain Personal Information from anyone under the age of 18 or knowingly allow such persons to register for our Services. If you are under 18, please do not send any Personal Information about yourself (such as your name, address, telephone number, or email address) to us. No one under age 18 is allowed to provide any Personal Information to or on the Services. In the event that we learn that we have collected Personal Information from a child under age 18 without verification of parental consent, we will use commercially reasonable efforts to delete that information from our database.

## Additional Information for non-US Residents

**IMPORTANT NOTICE:** This Privacy Policy originates and is hosted on a Website located in the United States, which has different data protection laws from those of other nations, and particularly member nations in the European Union. Due to differing laws and legal practice, be aware that law enforcement agencies in the United States may have access to your Personal Information.

If you are a resident of a country other than the United States, you acknowledge and consent to our collecting, transmitting, and storing your Personal Information out of the country in which you reside.

## Changes to Our Privacy Policy

We are continually working to improve our Services. We may need to change this Privacy Policy from time to time to address changes in policy or services. We will alert you to changes by placing a notice on our Website or as part of the Services, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services

after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we currently collect is subject to the Privacy Policy in effect at the time such information was obtained.

## Notification Procedures

It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business-related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on our Website, as determined by us in our sole discretion. We reserve the right to determine the form and means of providing notifications to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.