

## HomeField US, Inc. Privacy Policy

*Last Updated: February 3, 2022*

### Overview

This Privacy Policy describes HomeField US, Inc.'s policies regarding the collection, use, and disclosure of information about you in connection with your use of our services, including those offered through our websites, communications (e.g., emails, phone calls, and texts), and mobile applications (collectively, the "Service"). The terms "**we**", "**us**", "**HomeField US, Inc.**" and "**HomeField**" refers to HomeField US, Inc., a Delaware corporation with its headquarters in Greenwich, Connecticut.

When you use the Service, you consent to our collection, use, and disclosure of information about you as described in this Privacy Policy.

### Personal Information We Collect

HomeField US, Inc. collects Personal Information to facilitate your use of HomeField US, Inc. products and services. "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. It does not include de-identified or aggregate information, or public information lawfully available from governmental records.

The categories of Personal Information we have collected in the last 12 months preceding the date of this Privacy Policy and the categories of Personal Information we have disclosed for business purposes are described below. We will continue to collect the same categories of Personal Information and share them with the same categories of third parties for the same purposes.

### ***Personal Information That We Collect Directly From You***

In the past 12 months, we may have collected the following categories of Personal Information from you:

- **Personal Identifiers**, including your name, physical address, email address, phone number, account number, account password, IP address or mobile ad identifier, or other unique identifier
- **Characteristics of protected classes**, such as your age (over 40)
- **Commercial and financial information**, such as products purchased, returned, or considered; requests for information that you submit to our online help center.

- **Internet or other electronic network activity information**, such as browsing history, search history, information regarding your interaction with our website, and data about when you downloaded or accessed our programming We will continue to collect the same categories of Personal Information.

### ***Personal Information We Collect Automatically***

When you have interacted with our Services in the last 12 months, we or our service providers may have collected, through automated technologies, the following categories of Personal Information:

- **Personal identifiers** such as your IP address, mobile ad identifier
- **Internet or other electronic network activity information**, including browser type, operating system, search history on our Site, information regarding your device ID, the version of the app you are using, your experience on our website (e.g., how much time you spend on pages, which links you click, what you like and don't like), and additional information regarding your interaction with our website or mobile application

### **How We Use the Information We Collect**

The Personal Information we collect and the practices described above are done in an effort to provide you with the best experience possible, protect you from risks related to improper use and fraud, and help us maintain and improve HomeField US, Inc.'s offerings. We may use your Personal Information to:

- **Provide you with HomeField US, Inc.** HomeField US, Inc. uses your Personal Information to provide you with our Services pursuant to the terms of our Terms and Conditions.
- **Comply with legal and regulatory requirements.** HomeField US, Inc. processes your Personal Information as required by applicable laws and regulations.
- **Protect the security and integrity of our services.** HomeField US, Inc. uses your Personal Information to further prevent and identify fraud and other illegal activity.
- **Provide you with customer support.** HomeField US, Inc. processes your Personal Information anytime that you reach out to our Customer Support team with issues arising from your account.
- **Optimize and enhance our products and services.** HomeField US, Inc. uses your Personal Information to understand how our products and services are being used to help us improve our services and develop new products, and to help us optimize users' experiences interacting with our website and mobile application.

## How We Share the Information We Collect

In the 12 months prior to the date of this Privacy Policy, we may have shared the following categories of Personal Information with the categories of third parties described below, and we may continue to do so:

- **Service Providers.** We share Personal Information with service providers so that they can provide us with services, including identity verification, fraud detection and prevention, security threat detection, payment processing, customer support, data and website use analytics, advertising, marketing, data processing, network infrastructure, storage, transaction monitoring, and tax reporting. HomeField US, Inc. shares your Personal Information with these service providers only so that they can provide us with services as specified in our contracts with them, and we prohibit our service providers from using or disclosing your Personal Information for any other purpose.

More specifically, we use Google Analytics to collect information regarding visitor behavior and visitor demographics on our Site and Services. For more information about Google Analytics, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt out of Google's collection and processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

- **Professional Advisors.** HomeField US, Inc. may share your Personal Information with our professional advisors, including legal, accounting, or other consulting services for purposes of audits or to comply with our legal obligations.

Additionally, HomeField US, Inc. may share your Personal Information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities.

In the event of a proposed or consummated merger, acquisition, reorganization, asset sale, or similar corporate transaction, or in the event of a bankruptcy or dissolution, your Personal Information may be transferred as part of such a transaction or event.

We do not sell your Personal Information.

## Cookies

When you access HomeField US, Inc.'s services, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used to visit HomeField US, Inc. We use Cookies to help us recognize you as a customer, collect information about your use of HomeField US, Inc. services to better customize our services and content for you, and collect information about your computer or other access devices to assess and improve our services and advertising campaigns. Most browsers allow you to block and delete Cookies. Please note that if you reject some types of cookies, you may not be able to use some of HomeField US, Inc.'s services.

### **Information for California Residents**

The California Consumer Privacy Act of 2018 (the "CCPA") grants California residents certain rights with respect to their Personal Information, including, as described below, the right to know about, delete, and if applicable, opt-out of the sale of their Personal Information.

## ***RIGHTS AFFORDED TO CALIFORNIA RESIDENTS***

California consumers have the following rights under the CCPA with respect to their Personal Information. Please understand, however, that these rights are not absolute, and HomeField US, Inc. may decline requests as permitted under applicable law.

- **Right to Request Access.** You may submit a request that HomeField US, Inc. disclose the specific pieces of Personal Information that we have collected about you in the twelve (12) months prior to our receipt of your request.
- **Right to Know.** You may submit a request to know the following information about Personal Information we have collected about you in the twelve (12) months prior to our receipt of your request:
  - The categories of Personal Information we have collected.
  - The categories of sources from which we collected the Personal Information.
  - The business or commercial purposes for which we collected the Personal Information.
  - The categories of third parties with which we shared the Personal Information.
  - The categories of Personal Information we disclosed for a business purpose, and for each category identified, the categories of third parties to whom we disclosed that particular category of Personal Information.
- **Right to Request Deletion.** You may submit a request that HomeField US, Inc. delete the Personal Information that we have about you, which may be subject to various exceptions under the law.

### ***How to Exercise Your Rights and How We Will Respond***

You may submit a request to access, know about, or delete your Personal Information by clicking here [Insert Name of Link] or by emailing us at [Insert Email Address].

For requests to access, know, or delete Personal Information, we will first acknowledge receipt of the request within 10 business days of receipt of your request. We will provide a substantive response to your request within 45 days from receipt of your request, although we may be allowed to take longer to process your request under certain circumstances. If we expect your request is going to take us longer to fulfill, we will let you know. Please understand that we are not obligated to provide you with a copy of your Personal Information more than twice in a twelve (12) month period pursuant to the CCPA.

HomeField US, Inc. will verify your identity when you submit a request. We may request additional information from you to verify your identity, including your name, address, or other information we maintain about you. If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of the denial.

You are also entitled to submit a request for Personal Information that could be associated with a household as defined in the CCPA. Requests to access, know or delete household Personal Information must be jointly made by each member of the household, and we will individually verify all of the members of the household using the verification criteria explained above, and separately verify that each household member making the request currently resides in the household. If we are unable to verify the identity of each household member with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of our denial.

You may designate an authorized agent to make a request under the CCPA on your behalf. If you do so, you will be required to verify your identity by providing us with certain Personal Information as described above. Additionally, we will also require that you provide the agent with written and signed permission to act on your behalf, and we will separately confirm with you that you provided the agent with permission to submit the request. We may deny the request if the agent is unable to submit proof to us that you have authorized them to act on your behalf or if any of the above verification criteria are not met.

We will not discriminate against you for exercising any of your rights under the CCPA.

### ***Shine the Light***

California's "Shine the Light" law, Civil Code section 1798.83, requires certain businesses to respond to requests from California residents asking about the business' practices related to disclosing Personal Information to third parties for the third parties' direct marketing purposes. We do not disclose Personal Information to such entities, for such purposes.

## **Do Not Track**

We do not allow third parties to collect Personal Information about your online activities over time and across third-party websites when you use our website or Services. We do not respond to Do Not Track signals.

## **Information for Nevada Residents**

Nevada law (SB 220) requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. HomeField US, Inc. does not sell your Personal Information to third parties as defined in Nevada law, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law.

## **Children's Privacy**

The Service is intended for general audiences and is not directed to children under 13. We do not knowingly collect Personal Information from children under 13 and we do not sell the Personal Information of minors under 16. If you become aware that a child has provided us with Personal Information without parental consent, please contact us at [info@homefield.fit](mailto:info@homefield.fit). If we become aware that a child under 13 has provided us with Personal Information without parental consent, HomeField US, Inc. takes steps to remove such information and terminate the child's account.

## **Security**

We implement and maintain reasonable security appropriate to the nature of the Personal Information that we collect, use, retain, transfer or otherwise process. We take measures to safeguard your Personal Information, although such safeguards may not always be adequate to prevent all breaches of security. Information transmitted on the Internet and/or stored on systems attached to the Internet is not 100% secure. As a result, we do not ensure, warrant or guarantee the security or integrity of such information. We will not be responsible for disclosure of any information due to errors in transmission or the unauthorized acts of third parties.

You help to maintain the security of your personally identifiable information stored in our systems by keeping your username and password confidential and protecting against unauthorized access to your password and to your computer. Be sure to sign off when finished using a shared computer.

## **Third Party Websites**

While you are using this Service, you may be linked or directed to other third party sites outside of the Service that are beyond our control. For example, you might click on a link or banner ad that will take you off the Service. These links and banners may take you to sites of advertisers, sponsors and co-branding partners. Similarly, you may click on a social media button that you find on our website that will direct you to a third party social media platform. We are not responsible for the privacy practices or the content of these (or any) third party websites or platforms. This Privacy Policy applies only to the information collected by us.

## **Email Marketing**

Subject to applicable laws and regulations, HomeField US, Inc. may from time to time send via email direct marketing materials promoting services, products, facilities, or activities to you using information collected from or about you. You may opt-out of such communications at any time by unsubscribing at the bottom of any of our marketing emails.

## **Accessibility**

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at [insert email address].

## **Updates to This Privacy Policy**

HomeField US, Inc. may revise this Privacy Policy from time to time. If we make material changes to this Privacy Policy, we will notify you by posting a notice on our website and will also post an updated version on this website. By continuing to access or use the services after those changes become effective, you acknowledge the revised Privacy Policy.

## **Contact Information**

If you have questions or concerns regarding this policy or our processing of your Personal Information, please feel free to contact HomeField US, Inc. through the following:

Email: [info@homefield.fit](mailto:info@homefield.fit)