

# Revela Privacy Policy

This Privacy Policy governs the manner in which Revela, Inc. (“Revela,” and together with the affiliated legal entities that own various properties managed by Revela, “we,” “us,” or “our”) collects, uses, and shares personal information when you use Revela’s website at [www.revela.co](http://www.revela.co) and other websites that we manage in connection with our operations (collectively, the “Sites”), including all content, information, and functionality available through the Sites, and as part of Revela’s services (hereinafter collectively referred to as the “Services”). We respect the privacy rights of prospective customers, clients, and other individuals, and we hope that this Privacy Policy helps you make an informed decision about sharing personal information with us.

## Your Acceptance of Our Privacy Policy and Terms of Use

By using our Sites and Services, you agree to the terms of this Privacy Policy, as they may be amended from time to time by us in our sole discretion by posting an updated Privacy Policy on our Sites. This Privacy Policy applies to all users of the Services. By providing information to us, you understand and consent to the collection, maintenance, processing, and transfer of such information in and to the United States and other countries and territories, in accordance with United States law.

## Collection and Use of Information

In order to visit our Sites, for us to provide you with our Services, and to fulfill other purposes as outlined below, we may need to collect and process some personal information. “Personal Information” is information that is reasonably capable of identifying you, and we have provided specific examples of the Personal Information we may have collected about you below. Personal Information does not include de-identified or aggregated information, which is information in which identifiable information is removed and that cannot reasonably be used to identify an individual. We may use and share de-identified or aggregated information for any purpose.

Categories of Personal Information We Collect:

- **Identifiers**, such as name, postal address, telephone number, unique personal identifier, internet protocol address, email address, government identification numbers, financial account information, photographs, or other similar identifiers.
- **Demographic information**, such as race, national origin, citizenship, marital status, physical or mental disability, or sex (including gender or gender identity).
- **Commercial information**, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Professional or employment information** may be gathered from use of our Services, including information about employers, job titles, and income.
- **Internet or other similar network activity**, including browsing history, search history, links, and information regarding your interaction with an internet website, application, or advertisement. This information may be collected notwithstanding the use of do-not-track browser signals or settings. Our Sites utilizes cookies, which are pieces of

information that a website transfers to your computer's hard drive for record-keeping purposes. Cookies assist us in identifying your preferences when you visit our website and prevent you from having to reenter your information every time that you visit our website.

- **Geolocation data** is gathered when users interact with our Sites as IP addresses are obtained during such interaction, and IP addresses provide information about users' approximate location.
- **Profile information**, such as inferences drawn from Personal Information reflecting a user's preferences, characteristics, behavior, attitudes, intelligence, abilities, and aptitudes.

#### Categories of Sources for Personal Information We Have Collected:

- We have collected Personal Information from users of our Services through their direct interactions with our Services.
- We have collected Personal Information from affiliated legal entities that own various properties managed by Revela.
- We have collected Personal Information, such as technical data, usage data, and internet and other similar network activity, through automated technologies and users' interactions with our Services and from service providers.
- We have collected Personal Information from service providers and third parties who assist us to provide our Services, including property management and marketing partners, data brokers, and licensors.

#### Our Business or Commercial Purposes for Collecting Personal Information and Categories of Third Parties to Whom the Information was Disclosed:

- **Identifiers** are collected to market to individuals, provide users with our Services, to improve the quality, safety, customization, and security of the Services, to administer your account and process your requests and payments related to the Services, and to respond to direct inquiries. We may share identifiers with affiliated companies, our service providers that assist us to provide users with the Sites and Services, advertising networks, and data analytics providers.
- **Demographic information** is collected to market to individuals, provide users with our Services, and to improve the quality, safety, customization, and security of the Services. We may share demographic information with affiliated companies, our service providers that assist us to provide users with the Sites and Services, advertising networks, and data analytics providers.
- **Commercial information** is collected to market to individuals, provide users with our Services, to improve the quality, safety, customization, and security of the Services, to administer your account and process your requests and payments related to the Services, and to respond to direct inquiries. We may share commercial information with affiliated companies, our service providers that assist us to provide users with the Sites and Services, advertising networks, and data analytics providers.

- **Professional or employment information** is collected to market to individuals, provide users with our Services, to improve the quality, safety, customization, and security of the Services, and to administer your account. We may share professional or employment information with affiliated companies, our service providers that assist us to provide users with the Sites and Services, advertising networks, and data analytics providers.
- **Internet or other similar network activity** is collected to market to individuals, to provide users with our Services, to improve the quality, safety, customization, and security of the Services, to detect security incidents, and to protect against malicious, deceptive, fraudulent, or illegal activity. We may share internet or other similar network activity with affiliated companies, our service providers that assist us to provide users with the Sites and Services, data analytics providers, and advertising service providers to serve relevant advertisements and obtain analytics information concerning our advertising. We allow third parties to provide analytics services and serve advertisements on our behalf across the web and in mobile applications. These third parties may use technologies, including cookies, web beacons, and other technologies to collection information about your use of our services, including your IP address, web browser, mobile network information, pages viewed, time spent on pages, links clicked, and conversion information. In some cases, the information in these cookies and other technologies may be linked to other data we collect about you, such as your email address, which we may share in hashed or encrypted form. This information may be used by us and third parties to: (1) conduct research and diagnostics to improve our content, products and services; (2) deliver content, including ads relevant to your interests on our website; or (3) measure and analyze the performance of our services.
- **Geolocation data** is collected to market to individuals, to provide users with our Services, to improve the quality, safety, customization, and security of the Services, to detect security incidents, and to protect against malicious, deceptive, fraudulent, or illegal activity. We may share geolocation information with affiliated companies, our service providers that assist us to provide users with the Sites and Services, data analytics providers, and advertising service providers to serve relevant advertisements and obtain analytics information concerning our advertising.
- **Profile information**, is collected to market to individuals, provide users with our Services, to improve the quality, safety, customization, and security of the Services, and to administer your account. We may share profile information with affiliated companies, our service providers that assist us to provide users with the Sites and Services, advertising networks, and data analytics providers.

In addition, where consistent with applicable laws and regulations, we may disclose Personal Information in all categories above:

- to prepare, negotiate, or perform a contract with you;
- to respond to subpoenas, court orders, or other legal process otherwise required by law or the competent government or judicial authorities;
- to establish or preserve a legal claim or defense;
- in connection with a sale, merger, or consolidation of our business or other transfer of our assets, whether voluntary or by operation of law, or with an entity who is otherwise deemed to be our successor or transferee; or

- to prevent fraud or other illegal activities, such as willful attacks on our information technology systems.

## **Confidentiality of Information**

Revela will never share, rent, trade, or sell information given to us by you to a third party for marketing purposes. Only information about your account or transfers will be disclosed to third parties or to new billers: a) where it is necessary for opening or maintaining your account, or for completing transfers or payments, b) if lawfully required or, c) if you request or authorize it. We may provide your personal information to companies that provide services to help us with our business activities such as processing your rent payment or offering customer service. These companies are authorized to use your personal information only as necessary to provide these services to us.

Revela uses third parties to provide credit card processing, ACH payment processing, credit and criminal background check capabilities on our site. When you provide authorization to utilize any of these services, we will provide information as necessary for the third party to facilitate the requested service.

These third parties are prohibited from using your personal information for any other purpose.

## **Protection of Information Exchanged Online**

While going through the registration process at our website you submit personal and financial information that is necessary to begin using the service or process payments. During any exchange of information on our website a “secure session” is established with Secure Sockets Layers (SSL). Using 128-bit encryption SSL technology secretly encodes information that is sent over the Internet between your computer and Revela. To make sure the session is secure you will find “https” instead of “http” to the left of the web page address on your browser. That “s” means the session is secure. No method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee its absolute security.

## **Accurate and Updated Information**

Upon request, Revela will provide you with information about whether we hold any of your personal information. If your personal information changes, or if you no longer desire our service, you may update or delete it by making the change on our member information page, by emailing our Customer Support at [support@revela.co](mailto:support@revela.co). We will respond to your request within a reasonable timeframe.

The Revela infrastructure is designed to keep records accurate, current and complete. You will have the ability to see your personal information each time you login to the Revela website, or, if you would prefer, emailing us at [support@revela.co](mailto:support@revela.co) during regular business hours. If you see your records are incomplete, inaccurate or not current, please email, write or call us and we will investigate the matter and correct the information.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

## **Data Relating to Children Under 13**

Our Services are not directed at, and we do not knowingly collect Personal Information from, anyone under the age of 13 (or such other age as may be restricted under local law), unless it is for the express purposes of processing a rental application or establishing occupancy/tenancy for a minor resident. If we are made aware that we have received such information outside of this limited scope, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records.

## **Cookies**

We use session ID cookies and persistent cookies. We use session cookies to make it easier for you to navigate our site. We set a persistent cookie to store preference information, so you don't have to enter it more than once. Persistent cookies also enable us to track and target the interests of our users to enhance the experience on our site. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

## **Opt-Out Options**

Revela sends out confirmation emails and critical service updates. The user may not opt out of receiving these types of communications.

We give you certain choices regarding our use and disclosure of your Personal Information for promotional purposes. You may opt out from receiving electronic communications from us by contacting us at [support@revela.co](mailto:support@revela.co). If you no longer want to receive promotional-related emails from us, you may opt out according to instructions in such communications. Please note that if you opt out of receiving marketing-related messages, we will still send you important administrative messages as they pertain to the maintenance of your account.

## **Modifications to Privacy Policy**

If we decide to change our privacy policy, we will post those changes to this privacy policy and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this privacy policy at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our homepage prior to the change becoming effective,

## **How to Contact Us Regarding Privacy and Security Issues**

Privacy and Security are first on our list. We want you to feel comfortable using a service that was designed for you. The best way to do that is to make sure all of your questions and concerns are answered. Email us with questions or comments at [support@revela.co](mailto:support@revela.co).

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