

PRIVACY POLICY

LAST UPDATED: October 18, 2024

The 72SOLD Group of Companies, including but not limited to 72SOLD, Inc., 72SOLD National, LLC and our service providers, all of which are based in the United States (collectively, “72SOLD,” “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 you through:

Our website at <https://www.72SOLD.com> and other websites and 72SOLD-branded web-based applications we operate from which you are accessing this Privacy Policy (collectively, the “72SOLD Websites”),

Any 72SOLD-branded mobile applications if made available by us on or through mobile devices (collectively, the “72SOLD Apps”),

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 72SOLD Websites, the 72SOLD Apps, 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 may collect Personal Information including:

Name

Postal and email address

Telephone number

Current occupation

IP address

Physical location, which may be derived from your IP address or mobile device

Financial information (e.g., mortgage loan balance), when you choose to share it with us

Your real estate buying/selling interests, when you choose to share them with us

Your mobile device's location when you choose to share it with us

Photos

Your account log-in information for third-party websites, services, or applications, like Facebook and Google, when you choose to link these accounts to 72SOLD Websites or 72SOLD Apps

Your realtor license number

Any personal information you share while using our Services

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 a user profile when using our Services, register an account to access the Services, request a market analysis of your home, 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.

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 analyze or predict our users' preferences in order to prepare aggregated trend reports, so we can improve our 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 will provide personalized services based on our legitimate interests, and with your consent to the extent required by applicable law.

Allowing you to participate in sweepstakes, contests or other promotions.

We may offer you the opportunity to participate in a sweepstakes, contest or other promotion.

Some of these promotions have additional rules containing information about how we will use and disclose your Personal Information. Please read those additional rules before choosing to participate. We use this information to manage our contractual relationship with you.

Aggregating and/or anonymizing Personal Information.

We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose, as it no longer identifies you or any other individual.

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 72SOLD-affiliated agents, brokers, and market centers where you have requested such sharing or inquired about selling a property.

To third party sponsors of sweepstakes, contests, and similar promotions.

To our third-party business partners.

We may share your Personal Information with selected third-party business partners for our partners' own business purposes, including to enable them to send information about products and services that may be of interest to you, consistent with your choices. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in date and consent; this information will not be shared with any third parties. Please refer to "Choices and Access" below, for information about the choices we offer concerning such sharing.

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 comply with applicable law and regulations.

This may include laws outside your state of residence.

To cooperate with public and government authorities.

To respond to a request or to provide information we believe is important.

These can include authorities outside your state of residence.

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

App usage data

Information collected through cookies, pixel tags and other technologies

Demographic information and other information provided by you that does not reveal your specific identity

Information that has been aggregated in a manner such that it no longer reveals 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 (such as the App) you are using. We use this information to ensure that the Services function properly.

We use third party tools to automatically collect information about how you use our Services. This information includes any actions you take on 72SOLD Websites or 72SOLD Apps, including links visited, session details and duration, and what you type into the 72SOLD Websites or 72SOLD Apps. This information is collected to help us identify how our users use our Services, to ensure our Services are working properly, and to improve how and what we offer on our Services.

Through your use of 72SOLD Apps

When you download and use 72SOLD Apps, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.

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.

Analytics. We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/, and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

Physical Location

We may collect the physical location of your device by, for example, using satellite, cell phone tower or Wi-Fi signals. We may use your device's physical location to provide you with personalized location-based services and content. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you do, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content.

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. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

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 your interaction with us is no longer secure, or if you believe you have identified a security vulnerability, please immediately notify us in accordance with the "Contacting Us" section below.

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@72SOLD.com for assistance with the above. We will 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@72SOLD.com. We will respond to your request consistent with applicable law. If you are a California resident, please refer to the “California Consumer Privacy Notice” at the end of this Policy for more information about the requests you may make under California law.

In your request, please make clear what Personal Information you would like to have changed, and 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).

If you are a resident of California, under 18 and a registered user of the Services, you may ask us to remove content or information that you have posted to the Services by contacting us in accordance with the “Contact Us” section below. 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.

With respect to any 72SOLD App, use and transfer to any other application of information received from Google APIs will adhere to 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 16, and we do not knowingly collect or solicit Personal Information from individuals under the age of 16. Please email us at legal@72SOLD.com if you believe we collected personal information from an individual under the age of sixteen (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, payment card or account information, 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

72SOLD, Inc., located at 7333 E. Doubletree Ranch Road, Suite 100, Scottsdale AZ 85258, 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 legal@72SOLD.com or at the above address.

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

CALIFORNIA CONSUMER PRIVACY ACT NOTICE

ADDENDUM TO 72SOLD, INC. PRIVACY POLICY

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), 72SOLD provides the following details regarding the categories of Personal Information that we collect, use, and disclose about California residents. Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household.

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, sign up for a newsletter, register an account, purchase a product or service, or attend one of our events; and

Our affiliates, third-party providers of software applications made available on the 72SOLD Marketplace, and publicly available online sources.

CATEGORIES OF PERSONAL INFORMATION COLLECTED

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

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, 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 G. Professional or employment-related information; and

Category H. Geolocation data, such as device location;

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.

We do not sell Personal Information, as "sale" is defined in the CCPA.

INDIVIDUAL RIGHTS AND REQUESTS

If you are a California resident, you may request that we:

Disclose to you the following information covering the 12 months preceding your request:

The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;

The specific pieces of Personal Information we collected about you;

The business or commercial purpose for collecting (if applicable) Personal Information about you; and

The categories of Personal Information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information (if applicable).

Delete Personal Information we collected from you.

To make a request for the disclosures or deletion described above, please contact us at support@72SOLD.com. We will respond to your request consistent with applicable law.

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

CHANGES TO THIS CCPA NOTICE

We may change or update this CCPA Notice from time to time. When we do, we will post the revised CCPA Notice on this page with a new “Last Updated” date.

CONTACT US

If you have any questions regarding this CCPA Notice, please contact us at legal@72SOLD.com.