

## **Investor Underground Privacy and Data Policy**

Thank you for using this service, which is owned and operated by Investor Underground, LLC. ("Investor Underground," "we," "us," and "our") owns and operates this website (this "Site"). This Privacy and Data Policy (this "Policy") describes the information we collect from or about you through the Investor Underground-owned websites and mobile apps on which it is posted (collectively referred to as this "site"). It also describes how we use and share that information and some of the steps we take to protect your privacy.

### **Scope of This Policy**

Investor Underground collects certain information about or related to you through this Site. Some of the information Investor Underground collects may be "personal information"—information that identifies you personally, alone or in combination with other information available to us. Other information may be nonpersonally identifiable, such as your IP address.

Investor Underground has provided this Policy so that you will know what information Investor Underground collects, how Investor Underground uses this information, the types of third parties with which Investor Underground may share this information.

This Policy may be supplemented or amended from time to time by additional privacy notices ("Privacy Notices"), provided at the time we collect your information. For example, certain pages of this Site may contain Privacy Notices providing more details about the information we collect on those particular pages, why we need that information. In other cases, specific Privacy Notices may be required to comply with the privacy laws of one of the countries, provinces, or states in which we do business.

### **Your Consent**

By clicking the box indicating your consent, you agree you are bound by the terms of this Policy, and that it is admissible in court by virtue of the fact you have clicked the button indicating your agreement, even in the absence of an actual signature by you.

By clicking the box indicating your consent, you are also consenting to the collection, use, disclosure, and transfer of your information as described in this Policy (and any Privacy Notices that apply to you). If you do not consent to the collection, use, disclosure and transfer of your information as described in this Policy (and any Privacy Notices that apply to you), you may not use this Site. If you have questions about this Policy, or any Privacy Notice, please contact us via e-mail at [info@InvestorUnderground.com](mailto:info@InvestorUnderground.com).

### **Our Terms of Use**

This Policy is part of the Terms of Use that govern your use of this Site.

## Your Choices

In General. We respect your right to make choices about the ways we collect, use, and disclose your information. This Policy describes some of your choices, such as your choice to opt out of receiving “cookies” and to opt out of having your information shared with third parties for their own marketing purposes. In addition, and as required by applicable law, you can opt out of receiving promotional emails from us by clicking on the “unsubscribe” link at the bottom of each promotional email.

## Do Not Track Mechanisms

California law requires this policy to address how the Service responds to any “Do-Not-Track (“DNT”) signal” delivered by your browser. Because of the changing state of technology and indecision within the industry regarding the meaning of DNT signals, we currently do not make any guarantee that we will honor DNT signals.

## This Policy May Change

Investor Underground reserves the right to update or modify this Policy and any Privacy Notice, at any time and without prior notice, by posting the revised version of the Policy or Privacy Notice on this Site. These changes will only apply to the information we collect after we have posted the revised Policy or Privacy Notice on this Site.

Your continued use of this Site following any such change constitutes your agreement that all information collected from or about you after the revised Policy is posted will be subject to the terms of the revised Policy.

## Information We Collect

**Information You Manually Provide.** Investor Underground collects the information you manually provide (using your keyboard, mouse, or touchpad) when you use this Site. For example, we collect the information you provide when you contact us with questions, express interest in advertising on the Site, register with the Site and create a profile, participate in a forum discussion, or otherwise interact with this Site. Some of the information you manually provide may be personal information, such as your name and contact information.

**Information From Third-Party Social Media Platforms.** You may be able to register with, log on to, or enhance your profile on this Site by choosing to automatically populate the requested data

fields with information you previously provided to a third-party social media platform (such as Facebook or Twitter). By doing this, you are asking the third-party platform to send us information, including personal information, from your profile on that platform. We treat that information as we do any other information you give to us when you register, log on, or enhance your profile.

Information from your browser or device. Investor Underground collects information that is sent to us automatically by your web browser or mobile device. This information typically includes your IP address, the name of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. The information we receive may depend on your browser or device settings.

The information we receive from your web browser and device is not, in and of itself, personally identifiable. Generally, we use this information in the aggregate to help us improve this Site and make it more compatible with the technology used by our visitors. However, we may combine it with other information in an attempt to identify you or we may combine it with information that does identify you. We may also review our server logs for security purposes—for example, to detect intrusions into our network—and we might share our server logs, which contain visitors' IP addresses, with the appropriate investigative authorities who could use that information to trace and identify you.

Your Location. Using GPS technology, and with your opt-in consent, we may also collect precise, real-time location information from your mobile device and use that information to deliver tailored content through this Site. We may also share information about your location with your friends and other contacts, to the extent you interact with them using the social networking tools available on this Site.

Your mobile device may allow you to adjust your settings so that location information is not available to any mobile website or application. If you have questions about the security and privacy settings of your mobile or tablet device, please refer to instructions from your mobile service provider or the manufacturer of your device.

The information we receive from your mobile device is not personally identifiable, but we may link it to information that identifies you.

## COOKIES

What are cookies and other similar technologies?

Cookies are text files which are downloaded to your device when you visit a website. They are useful because they allow a website to recognize a user's device. You can find more information about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

The term cookie actually describes a range of technologies, including:

pixel tags (transparent graphic images placed on a web page or in an email, which indicate that a page or email has been viewed),

mobile device identifiers, and

web storage used in desktop software or mobile devices.

We'll use the term cookie throughout this Policy to cover all of these technologies, but we'll make sure we provide you with clear details about them all so that you can make informed choices about your cookie settings.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving your user experience. They can also help to ensure that ads you see online are more relevant to you and your interests.

There are a few different categories of cookies, including:

Session and Persistent Cookies:

Session Cookies: these are cookies which expire once you close your web browser; and

Persistent Cookies: these are cookies which stay on your device for a set period of time or until you delete them.

First and Third Party Cookies:

First-party cookies: these are cookies set by the website that you are visiting at that time, either by us, or by a third party at our request;

Third-party cookies: these are cookies that are set by a party other than that of the website you are visiting. If you visit the Investor Underground website and another party sets a cookie through that website this would be a third-party cookie.

Cookies also differ depending on the purpose they are used for, including:

#### Cookie Type and Purpose:

**Strictly Necessary Cookies:** These cookies are essential in order to enable you to use the features of our services, such as maintaining your playlist. Without these cookies, services you have asked for e.g., e-billing, cannot be provided.

In summary, these cookies enable services you have specifically asked for and make using our services possible.

**Performance Cookies:** These cookies collect information about how visitors use our services, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies collect anonymous information on the pages visited. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our services perform.

Web analytics that use cookies to gather data to enhance the performance of a website fall into this category. For example, they may be used for testing designs and ensuring a consistent look and feel is maintained for the user. This category does not include cookies used for behavioral/targeted advertising networks.

**Functionality Cookies:** These cookies allow the website to remember choices you make (such as your username, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.

These cookies remember choices you make to improve your experience.

If the same cookie is used for re-targeting they must be included in the 'Targeting or advertising cookies' category as well. It might also include cookies that are used to deliver a specific function, but where that function includes cookies used for behavioral/targeted advertising networks they must be included in the 'Targeting or advertising cookies' category as well as this category.

**Targeting or advertising Cookies:** These cookies are used to deliver advertisements more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organizations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organizations.

These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests.

## 2. How does Investor Underground use cookies?

Investor Underground, or our service providers acting on our behalf, uses the types of cookies identified in Section 1 above in the following ways:

### Cookie Type Purpose

**Strictly Necessary.** These cookies are necessary to allow us to operate the Investor Underground website as you have requested. For example, they let us recognize what type of subscriber you are and then provide you with services accordingly.

**Performance / Analytics.** We use cookies and other similar technologies to analyze how the Investor Underground website is accessed, is used, or is performing. We use this information to maintain, operate, and continually improve the Investor Underground website. We may also obtain information from our email newsletters or other communications we send to you, including whether you opened or forwarded a newsletter or clicked on any of its content. This information tells us about our newsletters' effectiveness and helps us ensure that we're delivering information that you find interesting.

**Functional.** These cookies let us operate the Investor Underground according to your preferences. For example, when you continue to use or come back to the Investor Underground, we can provide you with our services based on information you provide to us, such as remembering your username, how you have customized our services, and reminding you of content you have enjoyed or listened to on the service previously.

**Targeted Advertising.** We use these cookies and other similar technologies to serve you with advertisements that may be relevant to you and your interests, including interest-based advertising. The information may also be used to record how many times you've been served a particular advertisement and to ensure we do not display the same advertisement to you repeatedly, and to otherwise help us measure their effectiveness.

**Third Party.** We may allow our Business Partners to use cookies or other similar technologies on or outside Investor Underground for the same purposes identified above, including collecting information about your online activities over time and across different websites, applications, and/or devices.

**Investor Underground Ads.** We work with website publishers, application developers, advertising networks, and service providers to deliver advertisements and other content promoting Investor Underground on other web sites and services. Cookies and other similar technologies may be used to serve you with advertisements that may be relevant to you and your

interests on other websites, applications, and devices, and to regulate the advertisements you receive and measure their effectiveness.

The information we collect using cookies and similar technologies is not, in and of itself, personally identifiable, but we may link it to personal information that you provide. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit this Site, you may be unable to use all of the functionality of this Site if your browser rejects our cookies.

#### Additional Information About Third-Party Cookies.

In addition to the cookies Investor Underground delivers to your computer or mobile device through this Site, certain third parties may deliver cookies to you for a variety of reasons. For example, we may use Google Analytics, including the following Google Analytics Advertising Features: Adsense, Adwords, Doubleclick, Remarketing. Please note that the Google Analytics opt-out browser add-on does not prevent information from being sent to Investor Underground.

Other third parties may also deliver cookies to your computer or mobile device for the purpose of tracking your online behaviors across non-affiliated websites and delivering targeted advertisements either on this Site or on other websites.

#### How We Use Your Information

- to provide the information, products and services you request;
- to provide you with effective customer service;
- to provide you with a personalized experience when you use this Site;
- to contact you with information and notices related to your use of this Site;
- to contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);
- to invite you to participate in surveys and provide Feedback to us (in accordance with any privacy preferences you have expressed to us);
- to improve the content, functionality and usability of this Site;
- to better understand your needs and interests;
- to improve our products and services;
- to improve our marketing and promotional efforts;

- to keep the Site free by selling advertisements;
- for security, credit or fraud prevention purposes;
- for any other purpose identified in an applicable Privacy Notice, click-through agreement or other agreement between you and us.
- to contact you about our own and third parties' goods and services that may be of interest to you or that you may have requested information about;
- in any other way we may describe when you provide the information;
- to fulfill any other purpose for which you provide it; and
- for any other purpose with your consent.

### How We Share Your Information

**With Third-Party Vendors.** Investor Underground shares information collected through this Site with third-party vendors who act for us or on our behalf. For example, we may use third-party vendors to design and operate this Site; to conduct surveys; and to help us with our promotional efforts. These third-party vendors may need information about you to perform their functions. Additionally, we will share your information with third-party vendors when you request us to do so. For instance, you may request that we provide your information to hard money lenders so that you may receive information about offers and rates.

**With Other Users of this Site.** One of this Site's goals is to provide tools and resources to enhance real estate knowledge, networking, dealmaking, and marketing. Thus, User-Generated Content you post on this Site can be read, collected, and used by others. (In this Policy, "User-Generated Content" or "UGC" refers to your publicly available profile information and all content that you post using the social networking tools we make available to you. UGC does not include "Feedback" (as that term is defined in our Terms of Use.) In addition, we may feature you and your activity on this Site on our "stats" page at <http://www.InvestorUnderground.com/stats> or on our newsletter or via other automated emails to our members. We may also use UGC you submit for advertising campaigns and other promotions. We may or may not use your name in connection with such use, and we may or may not seek your consent before using the content for such purposes. You should have no expectation of privacy with respect to UGC you submit on or through this Site.

**With Third-Party Social Media Platforms.** We may provide functionality on this Site that allows you to automatically post information about the actions you take on this Site to a third-party social media platform (such as Facebook or Twitter). If you choose to take advantage of this functionality, people with access to your profile on the third-party platform may be able to see



the actions you have taken—for example, the items you have purchased. Thus, you should have no expectation of privacy in those actions. Further, if you choose to link your profile on this Site with an account on a third-party social media platform, we may share the information in your profile with that third-party platform. We may share or provide some of your information, such as an email address, to third-party social media platforms so that we can identify you in order to engage with you on those platforms.

**With Our Affiliates.** Investor Underground may share the information collected through this Site with other Investor Underground entities. These affiliate companies are permitted to use your information for their own marketing purposes and in a manner otherwise consistent with this Policy.

**With Other, Carefully Selected Business Partners.** From time to time, we may share your information with selected third parties for their own marketing purposes. For example, we may partner with third parties to sponsor contests or other promotions, and we may share with these third parties the information you submit to us to participate in the contest or take advantage of the promotion. Before doing so, however, we may offer you the opportunity to “opt out” or “opt in,” as required by applicable law.

**In Aggregate or De-identified Form.** We use information collected through this Site to create a compiled, aggregate view of usage patterns. We may share aggregate information with third parties so they can better understand our user base. We may also share with third parties information about how particular individuals use this Site, but only on a de-identified basis (“Individualized Data”). Individualized Data is not personally identifiable, but it does reflect the usage patterns of a particular Site user, as opposed to Site users collectively. We may provide basic demographic information (gender and age) in conjunction with providing Individualized Data. Third parties typically use this information for analytical purposes and to market their own products and services. It is possible that third parties will attempt to “re-identify” de-identified data, and you should know that this is possible using external points of reference.

**As Part of a Business Transfer.** Your information may be transferred to successor organization if, for example, we transfer the ownership or operation of this Site to another organization or if we merge with another organization. If such a transfer occurs, the successor organization’s use of your information will still be subject to this Policy and the privacy preferences you have expressed to us.

**To Comply with Laws and Protect Our Rights and the Rights of Others.** We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the law, a

court order or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of this Site; to enforce or apply our online Terms of Use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

As Described in a Privacy Notice or click-through agreement. We reserve the right to disclose your information as described in any Privacy Notice posted on a page of this Site where you provide that information. By providing your information on that page you will be consenting to the disclosure of your information as described in that privacy notice. We also reserve the right to disclose your information as described in any click-through agreement to which you have agreed.

### How We Protect Your Information

Investor Underground takes reasonable precautions to provide a level of security appropriate to the sensitivity of the information we collect. Although we use reasonable measures to help protect your information against unauthorized use or disclosure, we cannot guarantee the security of information provided over the Internet or stored in our databases and will not be responsible for breaches of security beyond our reasonable control.

### A Note About Children's Privacy

You must be at least 13 years old to have our permission to use this Site. We do not knowingly collect, use or disclose personal information about visitors under 13 years of age. If you are under the age of 13, you can use this service only in conjunction with your parent's or guardian's permission.

### Links to Other Websites

This Policy applies only to this Site. If you visit another Investor Underground website, please take a moment to review the privacy policy posted on that site to learn what information may be collected through that site and how it is processed.

This Site may also contain links to websites that are not operated by Investor Underground or its affiliates. These links are provided for your reference and convenience only and do not imply any endorsement of the products sold or information provided through these websites, nor any association with their operators. Investor Underground does not control these websites and is not responsible for their data practices. Any information you provide to third parties on their websites is covered under their privacy and data collection policies and is not covered by this

Policy. We urge you to review the privacy policy posted on any site you visit before using the site or providing any personal information.

#### Access to Your Information

If you would like to review, correct and update the personal information you have provided to us through this Site, you may be able to do so at <https://www.InvestorUnderground.com/profile>.

#### Retention of Personal Information

Investor Underground retains the personal information collected on this Site as long as necessary to provide the services, products and information you request or as permitted by applicable law.

#### This Site Is Hosted on Servers Located in the United States

Investor Underground is a U.S. corporation. The servers that support this Site are located in the United States. While it is in our possession, your information will generally be stored in Investor Underground databases or databases maintained by our third-party service providers on servers and data storage devices located in the United States. U.S. data protection laws may not provide as much protection as the data protection laws in force in some other countries, however, we will process your information in accordance with this Policy no matter where our data is stored. If you are located in a country outside the United States, by using this Site you consent to the transfer of your information to the United States.

#### Governing Law

This Policy shall be governed under the laws of the State of Colorado United States of America without regard to its conflicts of law provisions.

#### Questions About This Policy or Investor Underground's Data Practices

If you have questions or concerns about this Policy, any Privacy Notice, or Investor Underground's data practices, please contact us by email at [info@InvestorUnderground.com](mailto:info@InvestorUnderground.com).

### **California Privacy Notice**

This California Privacy Notice (“Notice”) is for California residents and supplements our Data Policy. It explains how we collect, use, and share your Personal Information and how to exercise your rights under the California Consumer Privacy Act (“CCPA”).

When we say “Personal Information” in this Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is aggregated or information that cannot be reasonably linked to you.

#### HOW WE COLLECT, USE, AND SHARE PERSONAL INFORMATION

To provide the products or features offered by Investor Underground (“Products”), we must process information about you, including Personal Information, whether or not you are registered or logged in. Subject to the limitations we describe in our Data Policy, we may share your Personal Information for business purposes with strict restrictions on how our partners can use and disclose the data we provide, at your direction, or in ways otherwise in accordance with the CCPA. We don’t sell any of your Personal Information, and we never will.

The best way to learn about the kinds of information we collect and how we use it is to review our Data Policy. Here is a summary of the CCPA-related categories of Personal Information we may have collected about you over the past 12 months, depending on how you use our Products, as well as how we use it and with whom we may have shared it.

<b>Categories of Personal Information we collect may include:</b>	<b>Examples of how Personal Information is used include:</b>	<b>Parties with whom your information may be shared include:</b>
---	--	--

<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Data with special protections, if you choose to provide it;</li> <li>• Commercial information, if you choose to provide it;</li> <li>• Internet or other electronic network activity information, including content you view or engage with;</li> <li>• Location-related information, including precise device location if you choose to allow us to collect it;</li> <li>• Audio or visual Information, including photos and videos, if you or others choose to provide it;</li> <li>• Professional or employment information, if you choose to provide it;</li> <li>• Education information, if you choose to provide it;</li> <li>• Financial information, if you choose to provide it; and</li> <li>• Information derived from other Personal Information about you, which could include your preferences, interests, and other information used to personalize your experience.</li> </ul>	<ul style="list-style-type: none"> <li>• Providing, personalizing, and improving our Products;</li> <li>• Facilitating transactions, providing measurement, analytics, advertising, and other business services;</li> <li>• Promoting safety, integrity, and security;</li> <li>• Communicating with you;</li> <li>• Researching and innovating for social good; and</li> <li>• To perform other business purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• People and accounts you share and communicate with;</li> <li>• People and accounts with which others share or reshare content about you;</li> <li>• Apps, websites, and third-party integrations on or using our Products;</li> <li>• New owners in the event of a change of ownership or control of all or part of our Products or their assets changes;</li> <li>• Partners, including partners who use our analytics services, advertisers, measurement partners, partners offering goods and services in our Products, vendors and service providers, and researchers and academics;</li> <li>• Law enforcement or other third parties in connection with legal requests; and</li> <li>• Investor Underground Related Companies</li> </ul>
--	--	---

To learn more about how we process information, including other types of Personal Information we collect, return to our [Data Policy](#).

## SOURCES OF PERSONAL INFORMATION

We receive Personal Information from the information that you and others provide, your device(s), and from our partners. The categories of sources from which we've collected or received Personal Information include:

- **You:** We collect the content, communications, and other information you provide when you use our Products, including when you sign up for an account, create or share content, and message or communicate with others. We collect information about the people, pages, accounts, hashtags, and groups you are connected to, and how you interact with them across our Products, such as the people you communicate with the most or the groups you are part of. We also collect information about how you use our Products, including ads we serve on and off Investor Underground, such as the types of content you view or engage with, the features you use, the actions you take, the people or accounts you interact with, and the time, frequency, and duration of your activities.
- **Other people:** We may also receive and analyze content, communications, and information about you that other people provide when they use our Products, such as when others share or comment on a photo of you, send a message to you, or upload, sync, or import your contact information.
- **Your device(s):** We collect information from and about the computers, phones, connected TVs, and other web-connected devices you use that integrate with our Products, and we combine this information across different devices you use.
- **Investor Underground Companies:** We may receive information from other Investor Underground Related Companies for business purposes that help us provide you with an innovative, relevant, consistent, and safe experience across all Investor Underground Products you use. We also process information about you across the Investor Underground Related Companies for these purposes, as permitted by applicable law, and in accordance with their terms and policies.

- **Partners:** Advertisers, app developers, and publishers and other partners can send us information for business purposes. These partners provide information about your activities off Investor Underground—including information about your device, websites you visit, things you do on their services, and purchases you make. We also receive information about your online and offline actions, and purchases from third-party data providers who have the rights to provide us with your information. Partners receive your data when you visit or use their services or through third parties they work with. We require each of these partners to have rights to collect, use, and share your data before providing any data to us.

## HOW CAN YOU EXERCISE YOUR RIGHTS PROVIDED UNDER THE CCPA?

Under the CCPA, you have the following rights:

- **Right to Know:** You have the right to request that we disclose to you the Personal Information we collect, use, or disclose, and information about our data practices;
- **Right to Request Deletion:** You have the right to request that we delete your Personal Information that we have collected from you;
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of these rights.

To exercise your “right to know” or your “right to request deletion,” send us an email at: [info@investorunderground.com](mailto:info@investorunderground.com)

Please note that to protect your information and the integrity of our Products, we may need to verify your identity before processing your request. In some cases we may need to collect additional information to verify your identity, such as a government issued ID.

Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. We may request that your authorized agent have written permission from you to make requests on your behalf and may need to verify your authorized agent’s identity.

CONTACT US FOR MORE INFORMATION

If you have additional questions about this Notice or how to exercise your rights under the CCPA, please email us at: [info@investorunderground.com](mailto:info@investorunderground.com)

## DATA POLICY

This policy describes the information we process to support Investor Underground and other products and features offered by Investor Underground.

### WHAT KINDS OF INFORMATION DO WE COLLECT?

To provide the Investor Underground Products, we must process information about you. The types of information we collect depend on how you use our Products.

Things you and others do and provide.

- **Information and content you provide.** We collect the content, communications and other information you provide when you use our Products, including when you sign up for an account, create or share content, and message or communicate with others. This can include information in or about the content you provide (like metadata), such as the location of a photo or the date a file was created. Our systems automatically process content and communications you and others provide to analyze context and what's in them for the purposes described [below](#).
- Data with special protections: You can choose to provide information in your Investor Underground [profile fields](#).
- **Your usage.** We collect information about how you use our Products, such as the types of content you view or engage with; the features you use; the actions you take; the people or accounts you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used our Products, and what posts, videos and other content you view on our Products.
- **Information about transactions made on our Products.** If you use our Products for [purchases](#) or other financial transactions, we collect information about the purchase or transaction. This includes payment information, such as your credit or debit card number and other card information; other account and authentication information; and billing, shipping and contact details.



- **Things others do and information they provide about you.** We also receive and analyze content, communications and information that other people provide when they use our Products. This can include information about you, such as when others share or comment on a photo of you, send a message to you, or upload, sync or import your contact information.

#### Device Information

As described below, we collect information from and about the computers, phones, connected TVs and other web-connected devices you use that integrate with our Products, and we combine this information across different devices you use. For example, we use information collected about your use of our Products on your phone to better personalize the content (including [ads](#)) or features you see when you use our Products on another device, such as your laptop or tablet, or to measure whether you took an action in response to an ad we showed you on your phone on a different device.

Information we obtain from these devices includes:

- **Device attributes:** information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.
- **Device operations:** information about operations and behaviors performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (which can help distinguish humans from bots).
- **Identifiers:** unique identifiers, device IDs, and other identifiers, such as from games, apps or accounts you use, and Family Device IDs (or other identifiers unique to [Investor Underground Products](#) associated with the same device or account).
- **Device signals:** Bluetooth signals, and information about nearby Wi-Fi access points, beacons, and cell towers.
- **Data from device settings:** information you allow us to receive through device settings you turn on, such as access to your GPS location, camera or photos.
- **Network and connections:** information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, connection speed.
- **Cookie data:** data from cookies stored on your device, including cookie IDs and settings.

Information from partners.

Advertisers, [app](#) developers, and publishers can send us information through tools they use, including our social plug-ins, Investor Underground Login. These partners provide information about your activities off Investor Underground—including information about your device, websites you visit, purchases you make, the ads you see, and how you use their services—whether or not you have a Investor Underground account or are logged into Investor Underground. For example, a business could tell us about a purchase you made in its store. We also receive information about your online and offline actions and purchases from third-party data providers who have the rights to provide us with your information.

Partners receive your data when you visit or use their services or through third parties they work with. We require each of these partners to have lawful rights to collect, use and share your data before providing any data to us.

## HOW DO WE USE THIS INFORMATION?

We use the information we have as described below and to provide and support the Investor Underground Products and related services described in the Investor Underground Terms. Here's how:

Provide, personalize and improve our Products.

We use the information we have to deliver our Products, including to personalize features and content and make suggestions for you on and off our Products. To create personalized Products that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data we collect and learn from you and others; how you use and interact with our Products; and the people, places, or things you're connected to and interested in on and off our Products.

**Information across Investor Underground Products:** We connect information about your activities on different Investor Underground Products to provide a more tailored and consistent experience on all Investor Underground Products you use, wherever you use them.

- **Product research and development:** We use the information we have to develop, test and improve our Products, including by conducting surveys and research, and testing and troubleshooting new products and features.

- **Ads and other sponsored content:** We use the information we have about you-including information about your interests, actions and connections-to select and personalize ads, offers and other sponsored content that we show you.

Provide measurement, analytics, and other business services.

We use the information we have (including your activity off our Products, such as the websites you visit and ads you see) to help advertisers and other partners measure the effectiveness and distribution of their ads and services, and understand the types of people who use their services and how people interact with their websites, apps, and services.

Promote safety, integrity and security.

We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Products, and promote safety and security on and off of Investor Underground Products. For example, we use data we have to investigate suspicious activity or violations of our terms or policies.

Communicate with you.

We use the information we have to send you marketing communications, communicate with you about our Products, and let you know about our policies and terms. We also use your information to respond to you when you contact us.

## HOW IS THIS INFORMATION SHARED?

Your information is shared with others in the following ways:

Sharing on Investor Underground Products,

People and accounts you share and communicate with,

Content others share or reshare about you.

You should consider who you choose to share with, because people who can see your activity on our Products can choose to share it with others on and off our Products, including people and businesses outside the audience you shared with. For example, when you share a post or send a message to specific friends or accounts, they can download, screenshot, or reshare that content to others across or off our Products, in person or in virtual reality experiences. Also, when you comment on someone else's post or react to their content, your comment or reaction is visible to anyone who can see the other person's content, and that person can change the audience later.

People can also use our Products to create and share content about you with the audience they choose.

Information about your active status or presence on our Products.

People in your networks can see signals telling them whether you are active on our Products.

New owner.

If the ownership or control of all or part of our Products or their assets changes, we may transfer your information to the new owner.

### Sharing with Third-Party Partners

We work with third-party partners who help us provide and improve our Products or who use Investor Underground features and functions to grow their businesses, which makes it possible to operate our companies and provide free services to people around the world. We don't sell any of your information to anyone, and we never will. We also impose strict restrictions on how our partners can use and disclose the data we provide.

Here are the types of third parties we share information with:

Partners who use our analytics services.

We provide aggregated statistics and insights that help people and businesses understand how people are engaging with their posts, listings, ads, videos and other content on and off the Investor Underground Products.

Advertisers.

We provide advertisers with reports about the kinds of people seeing their ads and how their ads are performing, but we don't share information that personally identifies you (information such as your name or email address that by itself can be used to contact you or identifies who you are) unless you give us permission. For example, we provide general demographic and interest information to advertisers (for example, that an ad was seen by a woman between the ages of 25 and 34 who lives in Madrid and likes software engineering) to help them better understand their audience. We also confirm which Investor Underground ads led you to make a purchase or take an action with an advertiser.

Measurement partners.

We share information about you with companies that aggregate it to provide analytics and measurement reports to our partners.

Partners offering goods and services in our Products.

A content creator on our site or seller on our site can receive your public information and other information you share with them, as well as the information needed to complete the transaction, including shipping and contact details.

Vendors and service providers.

We provide information and content to vendors and service providers who support our business, such as by providing technical infrastructure services, analyzing how our Products are used, providing customer service, facilitating payments or conducting surveys.

Law enforcement or legal requests.

We share information with law enforcement or in response to legal requests when required by law.

## HOW DO WE RESPOND TO LEGAL REQUESTS OR PREVENT HARM?

We access, preserve and share your information with regulators, law enforcement or others:

- In response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions outside of the United States when we have a good-faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards.
- When we have a good-faith belief it is necessary to: detect, prevent and address fraud, unauthorized use of the Products, violations of our terms or policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or Products), you or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm. For example, if relevant, we provide information to and receive information from third-party partners about the reliability of your account to prevent fraud, abuse and other harmful activity on and off our Products.

Information we receive about you (including financial transaction data related to purchases made with Investor Underground ) can be accessed and preserved for an extended period when it is the subject of a legal request or obligation, governmental investigation, or investigations of possible violations of our terms or policies, or otherwise to prevent harm. We also retain information from accounts disabled for terms violations for at least a year to prevent repeat abuse or other term violations.

Created June \_\_, 2020