## Updated: January 13, 2015

Contacting Us:

Apaus, Inc (dba homecoin.com) PO Box 3061 San Diego, CA 92163

https://www.homecoin.com/company/contact/

homecoin.com is completely committed to keeping your information private. We have enacted the below stated Privacy Policy to reflect this commitment to you, our customer.

#### **SHARING PERSONAL INFORMATION:**

The only Personally Identifiable Information we record is that which has been submitted by you.

We will not share your Personally Identifiable Information with anyone, unless:

- you have requested it, or
- you have taken actions on the website which require the sharing of your Personally Identifiable Information in order to complete the requested action (e.g. you request a home seller contact you or a service be provided to you).

#### INFORMATION COLLECTED AND METHODS OF COLLECTION:

1. Non-Personally Identifiable Information: We collect information such as IP addresses and browser settings (collectively "Traffic Data") via internal (use of server logs) and third party (use of google analytics) methods. This process does not reveal any Personally Identifiable Information (as defined below). We use this Traffic Data to understand the general location and types of people using the website at any given time.

We may use cookies to track visitor behavior and in our affiliate partnerships (when our website receives a fee from a partner for sending you to their website, where you make a purchase).

Visitors should assume that we are utilizing all tools and features made available to us by Google Analytics. Google Analytics does not collect any personally identifiable data. You can opt-out of Google Analytics for display advertising and customize Google Display Network ads using the ad settings (<a href="https://www.google.com/settings/ads">https://www.google.com/settings/ads</a>).

- 2. Personally Identifiable Information: In order to provide many of the products we offer and to authorize secure access to our website, it is necessary for us to obtain certain personal information (collectively "Personally Identifiable Information"). Personally Identifiable Information is collected when a user registers for a new account, submits information in the process of creating a listing, or completes other required information in the process of selling/buying a home. Personally Identifiable Information includes:
  - "Contact Data": Name, address, phone number, email.

- "Legal Data": Social security number, maiden name.
- "Financial Data": Credit card number, expiration date, billing address.
- "Demographic Data": Age, zip code, gender, education.

### HOW WE USE YOUR INFORMATION:

homecoin.com, often with the assistance of third parties, may use Personally Identifiable Information to:

- Verify a users identity
- Process a users orders and payments
- Generate the products and services ordered by a user
- Create more relevant advertising
- Develop a more user-friendly website
- Contact a user in regards to transactions, inquiries, changes to the site, and to send additional information on services we provide

A users Personally Identifiable Information will not be given to third parties, except when necessary to provide you with the services we offer. In addition, we may provide your Personally Identifiable Information to authorities or other third parties when required for compliance with the law.

We may provide data to third parties that does not personally identify you or your contact information but does identify the characteristics of our users in general.

#### **OPTING OUT:**

Users may choose to not provide any Personally Identifiable Information, in which case certain areas of the website will remain accessible, but we will not be able to create free listings or process orders placed.

If users do not wish to receive promotions and other updates from homecoin.com and our partners, they may chose to "opt-out" by selecting "unsubscribe" from any of the emails we send, or by logging in to homecoin.com and proceeding to <a href="https://www.homecoin.com/account">https://www.homecoin.com/account</a> and updating their communication preferences.

Google Analytics does not collect any personally identifiable data. You can opt-out of Google Analytics for display advertising and customize Google Display Network ads using the ad settings (<a href="https://www.google.com/settings/ads">https://www.google.com/settings/ads</a>).

# AREAS OF THE WEBSITE THAT ARE PUBLIC:

Areas of the homecoin.com website, such as forums, community question and answer sections, chat rooms, and real estate listings are open to the public. Any Personally Identifiable Information that users disclose in these areas should be considered public information. Users are advised to exercise caution when posting any Personally Identifiable Information in these areas.

#### THIRD PARTY WEB SITES:

This privacy policy applies only to homecoin.com and not to any other websites. homecoin.com maintains links to (and has affiliate relationships with) third party websites which have separate and

materially distinct privacy policies that should be reviewed and understood by users prior to usage of the third party website. homecoin.com takes no responsibility for the privacy practices of any third party website.

#### REVIEWING AND UPDATING PERSONALLY IDENTIFIABLE INFORMATION:

Users may review the Personally Identifiable Information that we have on record by logging into their account and proceeding to <a href="https://www.homecoin.com/account">https://www.homecoin.com/account</a>. Once logged in, users can review and update any of the information we have on file. If you wish to have your account permanently deleted from our website, please contact us at the address listed at the bottom of this page. In addition to the information found in the <a href="https://www.homecoin.com/account">https://www.homecoin.com/account</a> page, we also store data which you have provided in connection with any real estate transaction which you are conducting through the website.

### **ORDER INFORMATION:**

Information about previously placed orders can be received by contacting us at <a href="https://www.homecoin.com/company/contact/">https://www.homecoin.com/company/contact/</a>.

#### **DATA SECURITY:**

At homecoin.com we take data security seriously. Secure access to our website requires an encrypted connection. We have the following physical requirements:

- A third party company specializing in server management handles the access to and location of our servers.
- Passwords are required for electronic access to our servers,
- We use secure third party servers for storage of credit card numbers.

The following managerial security measures in place to protect user data:

• Access to administrative portions of the application is restricted to employees and third-parties based on their role in any given transaction,

Our employees are required to read and follow this Privacy Policy, any violation of this Privacy Policy by our employees will lead to reprimand, termination, and/or legal prosecution (depending upon the offense).

#### LOST AND STOLEN DATA:

homecoin.com has the following measures in place to protect against the loss, alteration, misuse or theft of customers data:

- Access to the database storing customer data requires an encrypted connection and password,
- he server where the database which stores the customer data is managed by a third-party company which specializes in the management of servers.
- We have scripts in place to detect the unauthorized alteration of data by users who are not involved in a given transaction, leading to the suspension of the user account and notification of website

administrators.

The use of the site constitutes agreement that homecoin.com has no liability to users or third parties arising out of the loss, alteration, misuse or theft of this data.

If you believe your login information or Personally Identifiable Information has been compromised at any time, contact us immediately via a method listed at the end of this document.

# **CHANGES TO THIS POLICY:**

Users should check back periodically for changes to this policy as homecoin.com reserves the right to make changes to this Privacy Policy at any time. The continued use of our website after the posting of changes indicates acceptance by the user of the changes. All information collected will be handled according to the Privacy Policy in effect at the time the information was collected.