

Privacy Policy

Last Updated: January 26, 2020

Clarus Real Estate, Inc. (collectively referred to herein as “Clarus Real Estate”, “Clarus”, “we”, “us”, or “our”), is committed to and will respect and protect the privacy of our clients, customers and others who use our websites, services and products. This Privacy Policy (“Policy”) provides details about how your personal information is collected and used by us. Personal information is any information that identifies you or would enable someone to contact you, which may include your name, email address, phone number and other non-public information that is associated with such information. This Privacy Policy applies to Clarus Real Estate, Inc. website, services and products that are located in the www.clarustechpartners.com domains; and any other sites owned or operated by us and our mobile applications (the “Sites”) and online services (“Services”). We encourage you to read this Privacy Policy and our Terms and Conditions of Use.

Data Protection Controller

For the purposes of data protection legislation, we are the data controller and we will maintain and process your data in accordance with all current Data Protection Laws and the European Union General Data Protection Regulation (GDPR) laws.

Clarus Real Estate, Inc.
3940 Hortensia Street
San Diego, CA 92110

Email: info@clarusrealestate.com

Information Collection and Use by Us

We are the sole owner of information collected on the Sites, except for contact lists and content that you provide to us in connection with your use of our services and products. We collect information only as necessary to fulfill the purposes set forth in this Privacy Policy and we will only use this information as described in this Privacy Policy. We may combine any or all of this data with other information we collect about you.

In connection with your use of our services or products, we will obtain contact lists, including email addresses, and content that you provide to us in connection with such use. We acknowledge your ownership rights in such contact lists and content. We will never sell or rent your contact lists to anyone without your permission and will never use your contact lists or content for any purpose other than as described here.

In the course of your use of our services or products or visit to the Sites, we may also obtain the following information about you:

- Information that you provide during any voluntary or mandatory registration process (such as first and last name, company name, email address, phone number, billing address or credit card information, geographic location and industry), when you call or email us (for support or otherwise) or when you use our services or products;
- Payment information that you provide to us (on our Sites or otherwise) when you purchase some of our services and products, including credit card data;
- Additional information about you that we collect from other sources, such as information you provide to us, information that is publicly available or that you consent to us receiving from third parties;
- Data relating to your activity on our Sites (such as your IP address, browser type and version, geographic location, pages you view, how you got to our Sites and any links you click on to leave our Sites, metadata about your use and your subscribers' use of our Sites and your emails you send (including clicks and opens), your interactions with any videos we offer and any device or other method of communication you use to interact with the Sites), which we store in a variety of places within our infrastructure, including system log files, back end databases and analytics systems.

We may use any of this information to offer and improve our services and products, to provide you with requested information or technical support, to facilitate your movement through the Sites or your use of our services and products, to do a better job of advertising and marketing our services and products, to diagnose problems with our servers or our services and products, in connection with our security and compliance programs, to administer our Sites, to communicate with you, to target prospective customers with our services or products, to assist us in offering you a personalized experience or otherwise tailor our Sites, product and service offerings to you, or as otherwise described in this Privacy Policy. We may aggregate and anonymize information received to produce reports on trends and statistics, such as mobile search trends, email open rates by industry, campaign best practices or the number of users that have been exposed to, or clicked on, our Sites or evaluated or purchased our services and products. Payment information that you provide to us, including credit card data, will only be used to facilitate payment for our services and products. We may also use recorded telephone conversations for quality control purposes, to train our employees and for our own protection. We will only use the username and password for any email account you import any contacts from to enable you to import such contacts.

Security and Privacy

We employ reasonable technical, administrative and physical safeguards to protect the confidentiality and security of your personal information. We use industry-recognized technical

safeguards, such as firewalls, and have adopted and implemented security procedures to protect your information from loss, misuse or unauthorized alteration. When we collect financial account information, such as credit card numbers, we protect its transmission through the use of encryption such as the Transport Layer Security (TLS) protocol.

Notwithstanding our efforts, we cannot guarantee absolute or unqualified protection of this information given the open nature and resulting instability of the Internet and World Wide Web, and we make no representations or warranties as to the effectiveness of our security and assume no liability for security breaches or any failure in the security of your computer equipment, your internet service provider or other networks and communications providers.

Sharing of Information

We may share your personal information only to courts, law enforcement authorities and other relevant third parties, such as internet service providers, when such disclosure is necessary or advisable, in our sole discretion, to conduct an investigation, respond to a third party or law enforcement subpoena or court order, bring legal action, prevent harm to others or pursue other relief when you or a third party are or may be: violating our terms and conditions of use; causing injury or other harm to, or otherwise violating our property or other legal rights, or those of other users or third parties; or violating federal, state, local, or other applicable law. To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties in connection with a subpoena.

Tracking Technologies

Technologies such as cookies, beacons, tags and scripts are used by us and our partners as well as our analytics and other service providers. These technologies are used in many ways, including advertising, sales and marketing, analyzing trends, administering and improving the Sites, tracking users' movements around the Sites (including point of entry), gathering demographic information about our user base, verifying login status, measuring the success of a particular marketing campaign, providing improved customer service, providing more relevant content, deterring or detecting fraud, and providing users with a customized experience. We also use these technologies as part of our product and service offerings, including to provide our clients and customers with information about their implementations. We collect information based on the use of these technologies on an individual as well as aggregated basis.

Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our Sites, but your ability to use some features or areas of our Sites may be limited.

Choice/Opt-out

You have a choice about how we use your personal information to communicate with you, and you may opt out at any time by unsubscribing or changing your preferences.

You always have the opportunity to opt-out of our communications with you or change preferences by following a link in the footer of all non-transactional email messages sent by us or by emailing us at info@clarusrealestate.com.

Some communications, for example, important account notifications and billing information, are considered transactional and are necessary for all of our clients and customers. To cancel your Clarus Real Estate, Inc. accounts, please see "Access to Personal Information" below. You may still receive marketing communications from us even after you cancel your account unless you also opt-out of our marketing communications, as described above.

To manage the information we receive about you from a social networking site or any other third party, you will need to follow the instructions from that party for updating your information and changing your privacy settings. The information we collect is covered by this Privacy Policy and the information the third party collects is subject to such third party's privacy practices. Privacy choices you have made on any third party site will not apply to our use of the information we have collected directly through our Sites.

If an account or profile was created without your knowledge or authorization, please contact us at info@clarusrealestate.com to request removal of the account or profile.

We take steps to ensure that the personal information we collect is accurate and up to date, and that you have the ability to access it and make corrections to it.

Upon request, Clarus Real Estate, Inc. will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at info@clarusrealestate.com.

If you would like to suspend or cancel your account, request that we no longer use your account data or obtain further information about or access to your personal information, you can do so by contacting Clarus Real Estate, Inc. by email at info@clarusrealestate.com.

We will retain and use your information for as long as your account is active or as needed to provide you with services, as necessary to comply with our obligations under this Privacy Policy and at law, resolve disputes, enforce our agreements and for backup purposes.

Third Party Links and Information Collection and Use by Our Customers

Some of our Sites may provide links to other websites. You may be asked to submit personal information to any of these sites. You may also be asked to provide certain personal information to our clients or customers in connection with their use of our services and products. Because we do not control the information policies or practices of these third party sites or our clients and customers, you should review their privacy policies to learn about how they collect and use personal information.

Children

Our Sites and our services and products are not directed to persons under 18. We do not knowingly collect personal information from children under 18. If a parent or guardian becomes aware that his or her child has provided us with personal information without such parent or guardian's consent, he or she should contact us. If we become aware that a child under 18 has provided us with personal information, we will delete such information from our files.

International Use

We are headquartered in the State of Connecticut, USA. Personal information may be accessed by us or transferred to us in the USA or to our partners, merchants, or service providers elsewhere in the world. By providing us with personal information, you consent to this transfer. We will protect the privacy and security of personal information according to this Privacy Policy, regardless of where it is processed or stored, however you acknowledge and consent to the fact that personal information stored or processed in the USA and will be subject to the laws of the USA, including the ability of governments, courts or law enforcement or regulatory agencies of the USA to obtain disclosure of your personal information.

For the purposes of current international Data Protection Laws including the European Union General Data Protection Regulation, with respect to your data, we are a data controller and with respect to your contacts' information, we are a data processor.

We have designated our Data Protection Officer to oversee our compliance with applicable privacy laws. Questions and inquiries concerning your privacy may be directed by email to info@clarusrealestate.com or write us at:

Clarus Real Estate, Inc.
Soundview Plaza
1266 E Main St, Suite 700R
Stamford, Connecticut 06902

Rights of Access, Correction, Objection, Deletion and Restricting Use of Your Personal Data

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your Personal Data changes.

Data protection legislation gives you the right to object to the processing of your Personal Data in certain circumstances or withdraw your consent to the processing of your Personal Data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your Personal Data, please send an email to info@clarusrealestate.com.

You can also ask us for the following:

- update or amend your Personal Data if you feel this is inaccurate;
- remove your Personal Data from our database entirely;
- send you copies of your Personal Data in a commonly used format; or
- restrict the use of your Personal Data so that it is only used for certain purposes, for example, you may require us only to hold your Personal Data for the purpose of providing services to you but not to use your Personal Data for marketing purposes.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes.

Please send any requests relating to the above to our Data Protection Officer at info@clarusrealestate.com specifying your name and the action you would like us to undertake.

Right to Withdraw Consent

Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact us at info@clarusrealestate.com.

Notification of Changes

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. If we decide to change this Privacy Policy in any material way, we will notify you by email or by means of a notice on www.clarusrealestate.com so our users are always aware of what information we collect, how we use it and under what circumstances we disclose it. In all cases, your continued use of any Site or our services and products constitutes consideration and your binding acceptance to any such changes.

Contact Information

If you have any questions, comments or requests regarding this Privacy Policy or how we collect, process or store your Personal Data, please contact us at info@clarusrealestate.com or at our address indicated in this Privacy Policy.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit our CCPA Privacy Policy.