

Reviero Privacy Policy

Thank you for visiting the Reviero website (www.reviero.com) (the "Site"), contacting Reviero, and/or using any Reviero mobile applications or services (the "Services"). This Privacy Notice is intended to describe how Reviero handles information that you provide, or that we learn about the individuals who: visit our website, contact us by mail, email or telephone or in person, or who provide us with information through any other means. We recommend that you carefully review this notice before providing us with any information. By accessing and using the Services, you agree to this Privacy Notice and our Terms of Use.

BY VISITING OR USING THE SERVICES, YOU EXPRESSLY CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH OUR POLICIES AND PRACTICES, YOUR CHOICE IS TO NOT USE THE SERVICES. YOUR PERSONAL INFORMATION MAY BE PROCESSED IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY. BY UPLOADING PERSONAL INFORMATION TO THE SERVICES, YOU WARRANT THAT YOU HAVE THE RIGHT TO TRANSFER SUCH INFORMATION OUTSIDE YOUR COUNTRY.

Children's Privacy

The Reviero website and Services are not intended for children under the age of 18 and Reviero does not knowingly collect any information from children under 18 years old through its website. If the parent or guardian of a child under 18 believes that the child has provided us with any information, the parent or guardian of that child should contact us if they want this information deleted from our files. If Reviero obtains knowledge from any source that it has information about a child

under 18 in retrievable form in its files, we will delete that information from our existing files.

What Information does Reviero Collect and How is it Used?

Registration Information

When you register to create an account, subscribe to a newsletter, or contact us with a question or comment you may voluntarily provide us with certain information, such as your name, email address, phone number or other contact information. We will use this information to administer your account and to respond to or fulfill any request or inquiry you may make.

Purchase Information

If you apply to purchase a home using the Services, you will be required to provide certain information that Reviero will use to verify your identity and to complete and administer the sale. This may include: legal name, date of birth, address, a copy of your government issued ID, passport, national ID card or driving license. We may also collect information regarding your bank account, credit history or other information needed to administer your account. Your home purchase application will contain full information regarding how we may use and access your online banking information. With your express authorization, we may use your information to perform a credit check or otherwise consider your eligibility to receive a loan or other financing.

Non-Personal Information

Like most website operators, Reviero collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request when visitors use the Services. Reviero's purpose in collecting non-personally identifying information is to better understand how Reviero's visitors use the Services. From time to time, Reviero may release

non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its Services and Reviero may use aggregate information for any person without obligation. Reviero also collects potentially personally-identifying information like Internet Protocol (IP) addresses and may collect statistics about the behavior of visitors to the Services. For instance, Reviero may monitor the Services to help identify spam. We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

In addition to log data, we may also collect information about the device you're using to access the Services, including the type of device, the operating system, device settings, device identifiers and crash data. Whether we collect some or all of this information often depends on what type of device you're using and its settings. To learn more about the information your device makes available to us, please review the policies of your device manufacturer or software provider.

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this type of information in order to increase the Services' functionality. These third-party service providers have their own privacy policies addressing how they use such information.

How we use your information

We use the information we collect to provide you full access and functionality of the Services. Accordingly, your information may be used for the following purposes:

- (i) to provide and improve our services, features and content;

- (ii) to research, analyze and predict trends and improve our financial projections;
- (iii) to administer your use of our services and accounts and to verify or authenticate information or identification provided by you;
- (iv) to enable users to enjoy and easily navigate the Services;
- (v) to better understand your needs and interests and personalize your experience;
- (vi) to fulfill requests or to respond to questions or comments you may make;
- (vii) to conduct checks against databases and other information sources, including background or police checks, to the extent permitted by applicable laws and with your consent where required,
- (viii) to provide you with announcements, notifications and advertisements related to your interests and use of the Services and other communications such as electronic newsletters, promotional e-mails or similar messaging;
- (ix) to provide service announcements;
- (x) to detect and prevent fraud, spam, abuse, security incidents, and other harmful activity, conduct security investigations and risk assessments and protect against users seeking to hack into the Services;
- (xi) to assess the level of general interest in the Services;
- (xii) to resolve disputes between any of our members and to enforce our agreements with third parties;
- (xiii) to enforce our Terms of Service and other policies and to comply with our legal obligations; and
- (xiv) for any other purpose with your consent.

In connection with the activities above, we may conduct profiling based on your interactions with the Reviero Services, your profile information and other content you submit to the Reviero Services, and information obtained from third parties

We process this personal information for these purposes given our legitimate interest in protecting the Reviero Services, to measure the adequate performance of our contract with you, and to comply with applicable laws.

With Whom Do We Share Your Information?

Personal Information

Reviero may share Personal Information with certain third parties such as our agents, service providers and other representatives acting on our behalf. For example, we may share Personal Information with third parties to perform services on our behalf such as:

- managing properties;
- procuring and maintaining insurance coverage;
- processing payments or dues; and
- conducting other business activities as needed.

The third parties with whom we conduct business are authorized to use your information only to perform the service for which they are hired. They are required to abide by the terms of our Privacy Notice including taking reasonable measures to ensure your personal information is secure. On occasion, we contract with trusted third-party providers who would receive your Personal Information and conduct anonymized aggregate analyses of the data. Through our contractual arrangements, we require our contracting partners to maintain adequate security of Personal Information provided to them. We do not permit such third parties to sell your Personal Information to other third parties.

Other Ways We May Share your Personal Information

We may disclose non-personally identifiable aggregated information about our users without restriction.

Other than to its employees, contractors and affiliated organizations or as described above, we disclose personally-identifying only when required to do so by law, or when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of Reviero, third parties or the public at large. If you send us a request (for example via chat, a support email or via one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users.

In addition, in some cases we may choose to buy or sell assets. In these types of transactions, user information is typically one of the business assets that is transferred. Moreover, if Reviero or substantially all of its assets were acquired, or in the unlikely event that Reviero goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of Reviero may continue to use your personal and non-personal information only as set forth in this policy. Otherwise, we will not rent or sell potentially personally-identifying and personally-identifying information to anyone.

We may also disclose your personally-identifying information if you expressly consent to the disclosure.

Security

We are committed to protecting your Personal Information. We regularly test our facilities and use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure.

We Do Not Sell Your Personal Information

Reviero does not, to the best of our knowledge, sell or rent personal information that we have collected or retain about you to any other third-party for any

purpose. Accordingly, we do not offer individuals the ability to “opt-out” of the selling or renting of personal information because we do not engage in those practices.

Our Data Retention Criteria

The period during which we store your personal information varies depending on the purpose for the processing. For example, we store personal information needed to provide you with products and services, or to facilitate transactions you have requested, for so long as you are a customer of Reviero. We store your personal information for marketing purposes until you have opted-out of receiving further direct marketing communications in accordance with applicable law. In all other cases, we store your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Statement, following which time it is either anonymized (where permitted by applicable law), deleted or destroyed.

Our Use of Cookies and Analytical Tools

Cookies are text files containing small amounts of information which are downloaded to your hard disk or to your browser's memory when you visit one of our Sites. Cookies are useful because they help arrange the content and layout of our Sites and allow us to recognize those computers or other devices that have been to our Sites before. Cookies do many different jobs, such as allowing our Sites to remember your preference settings and helping us to enhance the usability and performance of our Sites and your experience using them. Our Sites also may contain electronic images known as web beacons – sometimes called single-pixel gifs – that allow us to count the number of users who have visited specific pages. We may also include web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon. The type of cookie or similar technology that may be used on our Sites can be categorized as follows: Necessary cookies, Preference cookies, Statistic cookies, Marketing cookies, and Miscellaneous cookies.

- Necessary cookies. These cookies are essential for basic functionalities of the Sites, and they enable you to move around our Sites and use their features, particularly in connection with information searches and order placement. Without these cookies, services you have asked for cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet. Examples of necessary cookies are a shopping basket cookie, which is used to remember the products that you wish to purchase when you add products to your shopping basket or proceed to checkout, a login/ authentication cookie which allows and manages your login to the Site and identifies you after logging in for a single session, a session cookie which is required to carry out the data transmission and provide the Sites to you, a security cookie that detects repeat failed login attempts or similar abuses of the Sites. These types of cookies are regularly stored only as long as required for their purpose.
- Preference cookies. These cookies allow our Sites to store information that you provide like your preferences, and to store technical information useful for your interactions with our Sites. For instance, they remember your user ID and elements of your user profile. Preference cookies collect information anonymously and help us understand how visitors interact with our Sites. They also ensure that your experience using the website is relevant to you. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. These cookies will not be used to track your browsing activity on other websites. Without these cookies, a website cannot remember choices you have previously made or personalize your browsing experience. For example, we use a cookie to store your language preferences, which allows us to present you with product search results in the correct language, and we use a cookie to store your choice about the appearance of the cookie information banner that we display on our Sites. This cookie will help us remember your choice about the

appearance of the cookie information banner when you subsequently visit the same site where you made your choice about the banner and any other Reviero sites with the same domain or the same top-level domain.

- **Statistic cookies.** These cookies collect information about how you use our Sites, for example which pages you go to most often and if you get any error messages from certain pages. These cookies collect information that is used to improve how our Sites work. Without these cookies we cannot learn how our Sites are performing and make relevant improvements that could better your browsing experience. Examples of performance cookies that our sites use include cookies from Google and Adobe Analytics (see further discussion below).
- **Marketing cookies.** These cookies or similar technologies may be used to deliver advertisements that are more relevant to you and your interests. They may also be used to limit the times you see an advertisement as well as help to measure the effectiveness of the advertising campaign. These cookies may track your visits to other websites. Without these cookies or other technologies, online advertisements you encounter from Reviero and from our third-party partners and providers will be less relevant to you and your interests.
- **Miscellaneous cookies.** Miscellaneous cookies are unclassified, and help with the overall functionality, targeting and performance of our Sites.

Setting your cookie preferences

For users in the European Union and United Kingdom, you may select the cookies you want to keep. For more information and to update your preferences, click the “Cookie Settings” link on our website.

You can usually modify your browser settings to decline cookies and you can withdraw your consent at any time by modifying the settings of your browser to reject or disable cookies or by opting out of specific cookies through the opt-out

options shared below. If you choose to decline cookies altogether, you may not be able to fully experience the features of the Sites that you visit.

Reviero's use of web analytics

As part of our use of cookies, we may also use different analytic tools which serve the purpose of measuring, analyzing and optimizing our marketing measures and provide you with customized advertisements that could be of particular interest to you.

For users in the European Union and United Kingdom, we cannot run these web analytic tools without your consent. If you choose not to provide consent, these analytic tools will not be run on the website. You may select the cookies you want to keep and update your preferences by clicking the "Cookie Settings" link on our website.

Analytic tools may include the following:

- Google Analytics and Heap use cookies which enable an analysis of your use of the Sites. The information collected (IP address, browsing activities and other data linked to your usage of the Sites) is usually transferred to a Google server in the U.S. and stored there. You can prevent Google Analytics and Heap from recognizing you on return visits to the Sites by disabling cookies on your browser. For details on how you can opt-out of certain features, visit the Google Analytics's [opt-out browser add-on](#) and Heap's [privacy policy](#).
- Google Tag Manager helps to manage website tags through a single interface. The tool itself (implementing the tags) triggers other tags that may themselves collect (personal) data. However, Google Tag Manager does not access this data.

Your Rights and Responsibilities

You are permitted, and hereby agree, to only provide personal information to Reviero if such personal information is accurate, reliable, and relevant to our relationship and only to the extent such disclosure will not violate any applicable data protection law, statute, or regulation.

You may have certain rights under applicable data protection law with respect to personal information about you that is collected through the Sites or when you contact or otherwise engage with us. To exercise any of these data privacy rights, please contact us, or have your authorized agent contact us, in accordance with the "Contact Us" section listed below. In the event you submit, or your authorized agent submits on your behalf, a data request, you (and your authorized agent) hereby acknowledge and agree, under penalty of perjury, that you are (or the authorized agent of) the consumer whose personal information is the subject of the request. We will respond to any data requests within the time frames required by law, and we may charge a fee to facilitate your request where permitted by law.

Marketing. You have the right to opt-out of receiving electronic direct marketing communications from us. All electronic direct marketing communications that you may receive from us, such as e-mail messages, will give you an option of not receiving such communications from us in the future.

European Union (EU) Privacy Disclaimer

Reviero processes personal information in accordance with the legal bases set forth in the EU General Data Protection Regulation (GDPR) or EU Member State law. For example, our processing of Personal Data on individuals (as described above) is justified based on statutory provisions that (1) processing is based on the consent; (2) processing is necessary for Reviero's legitimate interests as set out herein; and (3) processing is necessary for the performance of a contract to which you are a party. If you are in the EU or afforded protection under the GDPR, you may have certain rights with respect to the Personal Data. To the extent permitted by applicable data protection laws, you may access the Personal Data

we hold about you; request that inaccurate, outdated, or no longer necessary information be corrected, erased, or restricted; and, request that we provide your Personal Data in a format that allows you to transfer it to another service provider. You also may withdraw your consent at any time where we are relying on your consent for the processing of your Personal Data. You may object to our processing of your Personal Data where that processing is based on our legitimate interest. You have the right to lodge a complaint with your competent data protection authority. If you wish to exercise any of these rights, please contact us in accordance with the instructions provided below.

Links to Third Party Websites

The Services may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Changes to This Privacy Policy

We may occasionally update this Privacy Statement. When we do, we will revise the "last updated" date at the top of the Privacy Statement and take such additional steps as may be required by law.

If you have questions regarding this Privacy Statement, our handling of your personal information, or would like to request more information or exercise a data right, please contact us by email at info@reviero.com.

Personal Information

- Know Your Client: We may need to comply with Anti-Money Laundering regulations evidence of source of funds.

Security

In any event we are committed to keeping the personal information provided to us secure and we have implemented appropriate information security policies, rules and technical measures to protect the personal information.

All of our partners, employees, consultants and data processors, who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of such personal information.

Your data will be stored with the company Auth0 and duplicate in HubSpot, so will be under their high standard protection according to their data protection policy, see her ([Link](#)).

We have signed a data sharing agreement which is based on the EU standard contractual clauses to ensure we will comply with our legal and regulatory obligations in relation to personal information, including having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

If you are in the EU you have the following rights:

Access: To request a copy of the Personal Data we are processing about you.

Rectification: To require that any incomplete or inaccurate Personal Data is amended.

Deletion: To request that we delete Personal Data, unless we are obliged to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.

Restriction: To request that we restrict our processing of your Personal Data where:

- you believe such data to be inaccurate;
- our processing is unlawful; or
- we no longer need to process such data.

Portability: To request that we transmit the Personal Data we hold in respect of you to another data controller

Objection: right to object data processing on grounds relating to your particular situation.

Withdrawing Consent: you have the right to do it at any time

Complain: You have the right to lodge a complaint with the local data protection authority. You can access to a local data protection authority here (Link).

Term to keep your data

For visitors to the Site, we will retain relevant personal information for at least three years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation.

For Service provision to any client, we will retain relevant personal information for at least six years from the date of our last interaction with that client and in compliance with our obligations under the EU General Data Protection Regulation

For short period services, e.g. for specific marketing campaigns we may delete it after the campaign.

Governing Law

This Privacy Policy shall be governed by and construed in accordance with the laws of England and Wales, without regard to its conflicts of law principles.”