### STELLAR MLS PRIVACY POLICY

This privacy policy ("Privacy Policy") describes how Stellar MLS ("Stellar MLS") may collect, use and share information that we have obtained through your use of our website, https://www.StellarMLS.com/ ("Website") and all related features, functionalities and services, including but not limited to online platforms, dashboards, and user accounts that may be made available to you (collectively, the "Services"). By using the Services, you are consenting to the practices described in this Privacy Policy. "You" or "your" means and refers to you as a visitor of our website or user of any of our Services. "We," "our," "us" or "Stellar MLS" refers to Stellar MLS.

Our Privacy Policy is designed to provide transparency into our privacy practices and principles, in a format that you can navigate, read and understand. We are dedicated to treating your personal information with care and respect. Please review the following Privacy Policy and contact us at legal@Stellarmls.com if you have any questions or concerns.

#### **ACCEPTANCE OF TERMS:**

By accessing or using our Services you agree to be bound by the terms and conditions of this Privacy Policy, and our Terms of Use available at https://www.stellarmls.com/terms-of-use. By accessing our Services, you acknowledge that you fully understand our Privacy Policy and freely consent to the collection, use and disclosure of your Personal Information, as described in this Privacy Policy. If you do not consent to the collection, use and disclosure practices described below, you must immediately cease any access or use of our Services.

# PRIVACY POLICY SCOPE:

This Privacy Policy describes:

- 1. Types of Information We Collect
- 2. How We Collect Information (Sources of Information)
- 3. How We Use Your Information
- 4. How We Share or Disclose Your Information
- 5. How We Protect the Privacy of Children Online
- 6. Information Retention
- 7. Security
- 8. Third-Party Services
- 9. Electronic Marketing, Notifications and Communications
- 10. CAN-SPAM ACT
- 11. Your Access to and Control Over Your Information
- 12. International Visitors
- 13. Additional State Specific Privacy Rights
- 14. Changes to Our Privacy Policy
- 15. Contact Us

This Privacy Policy applies to Information we collect through the Website and other electronic communications sent through or in connection with the Services. This Privacy Policy may change from time to time (see <u>Changes to Our Privacy Policy</u> section below). Your continued use of the Services after we revise our Privacy Policy means you accept and consent to those changes, so please check the Privacy Policy periodically for updates.

#### TYPES OF INFORMATION WE COLLECT:

When you use the Services, certain types of data may be collected from you, including: (1) Personal Information; and (2) Non-Personal Information (collectively referred to as "Information"). For more detailed information on the collection of Personal Information from children, please refer to the "How We Protect the Privacy of Children Online" section below.

You may be able to view, access, use or download certain portions of the Services, or content displayed thereon, without disclosing any information that, either alone or in combination with other information, can be used to uniquely identify, contact or locate you (collectively, "Personal Information"). However, certain portions of the Services may only be accessible by disclosing certain Personal Information. We may collect or receive the categories of Personal Information listed below, which may depend on the Services you use, and your device and account settings. Not all categories of Personal Information will be collected or received about every Website guest.

- Identifiers, including your first and last name, address, email address, telephone number and language preferences;
- Commercial information, such as records of subscriptions or services purchased by you through Stellar MLS (note that we use third party payment processors to facilitate your payments and do not have access to or store your payment information);
- Characteristics of protected classifications, such as date of birth and gender;
- Professional or employment related information, such as the employer's name, job title, business name, business address, business phone number, NRDS number, MLS number and real estate license number (some of which may not be considered Personal Information);
- Device and online identifiers, such as IP address, device identifiers, and identifiers associated with cookies;
- Internet or other similar network activity and web analytics, such as information about how you use, access, or interact with the Services;
- Communications, such as communications voluntarily submitted through the Website when contacting Stellar MLS;
- Records of communications with our customer support team for training and quality assurance purposes.

# HOW WE COLLECT INFORMATION (SOURCES OF INFORMATION):

### Information Provided Directly by You.

You may actively provide Information to us in various ways while using our online Services. Depending on your reason for interacting with Stellar MLS, some of the following will not be applicable to you. For example, you may share Personal Information when you:

- Update your customer profile in the Stellar Central® Portal (the "Portal");
- Request information about our Services and you provide us with Personal Information;
- Contact us through any of our Services;
- Submit an online form expressing your interest in joining Stellar MLS;
- Complete an online form requesting in-office training;
- Scan QR codes at conferences;
- Interact with our Chatbot and you provide Personal Information;
- Create a board member account or update your board member profile;
- Complete an online form through our Website, such as a vendor intake form via MLS Grid;

• Sign-up as a vendor to participate in the Stellar MLS Marketplace and provide your name, business email address, business name and number and business address.

# Information Provided by Our Service Providers, Vendors and Third-Parties.

Information Provided by Brokers and Associations.

Stellar MLS works with third-party brokers and realtor associations. Brokers and Realtor associations that have entered into agreements with Stellar MLS, provide Stellar MLS with certain Information related to their agents and brokers including but not limited to first and last name, address, email address, phone number, NRDS number and MLS number. Brokers and agents that have agreed to the separate terms and conditions set forth in a Subscription Agreement, are also referred to herein as "Participants" and "Subscribers," respectively.

Information Provided by Service Providers and Vendors.

Stellar MLS may engage a variety of third-party vendors, service providers and technology partners (collectively, "Vendors") to support, enhance and promote our business operations and services. Such Vendors may include, but are not limited to, providing marketing, advertising, email and SMS communications, Chatbot services, and related technology services for Stellar MLS. As part of these relationships, we may share or receive certain information that enables Stellar MLS and our Vendors to offer, improve, and market products and services, either on behalf of Stellar MLS, or in collaboration with Stellar MLS.

Information Provided by Analytics Providers.

We may use third party service providers to provide us with analytics on Website traffic and use of the Services. Stellar MLS may use analytic tools to analyze the performance of our Services as well as how visitors use our Services including:

• Google Analytics - For more information on Google Analytics cookies and privacy policies, visit www.google.com/policies. To opt-out of being tracked by Google Analytics across all websites visit <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>. This will allow you to download and install a Google Analytics cookie-free web browser.

#### **Payment Information.**

If you are a Participant or Subscriber signing-up to join Stellar MLS, we use third-party payment processors to process your payments. These third parties will collect the information necessary to effectuate your transaction with us, such as credit/debit card number, security/CVV code, and expiration date. Our payment processors may handle your payment information in accordance with their own privacy policies. Stellar MLS does not have access to your payment information.

# **Automatically Gathered Information.**

Stellar MLS automatically tracks certain information about you based upon your behavior while using the Services. This information is used to better understand and serve you by responding to your particular interests and needs.

### Usage Details.

When you access and use the Services, we may automatically collect certain details of your access to and use of the Services, including traffic data, date and time you access the Services, the number of links you click within the Services, and any third party website and sections within the Services that you

# Device Information.

When you access the Services, we may collect information about your device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, and network information.

### *Use of Cookies (or mobile cookies).*

Our Services may use cookies to enhance the user experience while using our Services. Cookies are pieces of information that some apps and websites transfer to the computer or mobile device that is browsing that app or website and are used for record-keeping purposes by many apps and websites. Use of cookies makes web browsing easier by performing certain functions such as saving your passwords, saving personal preferences regarding your use of the particular app or website, and ensuring that you don't see the same advertisement repeatedly. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your device. However, if you select this setting, you may be unable to access certain parts of our Services.

By continuing to use our Services, you are agreeing to our use of cookies. We may choose to use any or all of the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Services. They may include, for example, cookies that enable you to access secure areas of our Services.
- Analytical/performance cookies. These cookies allow us to recognize and count the number of visitors and to see how visitors move around our Services when they are using them. This helps us to improve the way our system works, for example, by ensuring that Website guests are finding what they are looking for easily.
- Functionality cookies. These are used to recognize you when you return to our Services. This enables us to personalize our content for you and remember your preferences.
- Targeting cookies. These cookies record your visit to our Services, the pages you have visited and the links you have followed. We may use this information to make our Services and the advertising displayed more relevant to your interests.

Please note that third parties including, for example, Third-Party Providers whose services have been integrated into the Stellar MLS Services, including but not limited to, Centris Corporation, which provides certain digital tools and resources for multiple listing services, may also use cookies and other tracking mechanisms, over which we have no control.

### Use of Web Beacons.

A "web beacon," "clear GIF," "web bug," or "pixel tag" is a tiny graphic file with a unique identifier that is similar in function to a cookie but allows us to count the number of Website guests that have visited certain pages or screens of our Services, and to help determine the effectiveness of promotional or advertising campaigns, and for other related statistics.

# HOW WE USE YOUR INFORMATION:

## Generally.

We may use your Personal Information for our commercial and business purposes including:

- Providing and Supporting our Services:
  - o Creating and maintaining Participant and Subscriber account;
  - o Confirming a Participant or Subscriber's authorization to access certain data available through the Stellar MLS Services;
  - o Creating and maintaining board member accounts;
  - Confirming a board member's authorization to access certain information restricted to board members;
  - o Confirming a Vendor's eligibility to participate in the Stellar MLS Marketplace
  - o Providing the functionality and Services requested;
  - o Providing users with a tailored experience when using our Services;
  - Enhancing functionality of our Services;
  - o Providing analytic services.
- Communicating with you about our Services:
  - o Providing you with customer service and technical support;
  - o Responding to correspondence we receive from you directly through our contact us page, our Chatbot or received otherwise.
- Providing advertising and marketing services including:
  - o Sending email marketing communications with content we think will interest you;
  - o Marketing and selling our Services.
- Improve, monitor, personalize, and protect our Services including:
  - Understanding your needs and interests, and personalizing your experience with the Services and our communications;
  - o Troubleshooting, testing, and research, and keeping the Services secure;
  - o Investigating and protecting against fraudulent, harmful, unauthorized, or illegal activity.
- Research and Development
  - o Debugging;
  - o Undertaking internal research for technological development and demonstration;
  - Verifying or maintaining quality or safety or improving or upgrading our Services.
- Compliance and protection. We may use Personal Information to enforce and comply with our terms and policies, and to defend us against legal claims or disputes including:
  - Protecting our, your or others' rights, privacy, safety, or property (including by making and defending legal claims);
  - Auditing our internal processes for compliance with legal and contractual requirements and internal policies;
  - o Enforcing the terms and conditions that govern the Services; and
  - o Preventing, identifying, investigating, and deterring fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

Some processing may also be necessary to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities, and other legal obligations such as to keep records of transactions.

#### Non-Personal Information.

We may collect and create de-identified and aggregated information and other non-Personal Information, which is not related to an identified or identifiable natural person ("Non-Personal Information"). You agree that Stellar MLS owns, without restriction, all Non-Personal Information and that you have no rights in or to any Non-Personal Information. Because Non-Personal Information cannot be used to personally identify you, you agree we may use such information for any lawful purpose.

### HOW WE DISCLOSE YOUR INFORMATION:

We may disclose aggregated Non-Personal Information about our Website guests and users, and information that does not identify any individual, without restriction. We may disclose Personal Information that we collect, or you provide as described in this Privacy Policy:

- To service providers, business associates, affiliates, Vendors and other authorized third parties we use to support our business and commercial relationships, and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Stellar MLS's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Stellar MLS about our Website guests and users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your Personal Information:

- To enforce or apply our Terms of Use, or any other additional terms and conditions agreed to in separate agreements.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Stellar MLS, or others.

In the past twelve months, Stellar MLS has collected, used and disclosed the following categories of Personal Information for the purposes, and to the recipients, set forth below.

and/or Disclose	Sources From Which the Personal Information is Collected	Commercial Purpose(s)	The Categories of Recipients to Which we Disclose Personal Information
ITITET and last hame address	Associations.	with other MLS providers, service providers, and authorized third parties, so that the MLS providers	Other MLS Providers, service providers and authorized third parties.

Categories of Personal Information We Collect and/or Disclose		The Business or Commercial Purpose(s) for Which the Personal Information is Collected, Used, and/or Disclosed	The Categories of Recipients to Which we Disclose Personal Information
		Participants	
Characteristics of protected classifications, such as date of birth and gender.	Directly from you or from Participants or Associations.	We share this information with other MLS providers, service providers, and authorized third parties, so that the MLS providers and service providers can provide services to Subscribers and Participants.	Other MLS Providers, service providers and authorized third parties.
Professional or employment related information, such as the employer's name, job title, business name, business address, business phone number, NRDS number, MLS number and real estate license number (some of which may not be considered Personal Information).	Participants or Associations.	We share this information with other MLS providers, service providers, and authorized third parties, so that the MLS providers and service providers can provide services to Subscribers and Participants	Other MLS Providers, service providers and authorized third parties.
Commercial information, such as records of subscriptions or services purchased by you through Stellar MLS.	Directly from you	We use third party payment processors to facilitate your payments and do not have access to or store your payment information.	Payment Processors
Device and Online Identifiers, such as IP address, device identifiers, and identifiers associated with cookies.	Directly from you or from our service providers	To improve, monitor, personalize, and protect our Services.	Analytics Partners
Internet or other similar network activity and web analytics, such as information about how you	Directly from you or from our service providers	To improve, monitor, personalize, and protect our Services.	Analytics Partners

Information We Collect and/or Disclose	Sources From Which the Personal Information is Collected	Commercial Purpose(s)	The Categories of Recipients to Which we Disclose Personal Information
use, access, or interact with the Services.			

When you provide us with Personal Information, we imply that you consent to our collecting it and using it to carry out our legitimate business and commercial purposes as described herein.

### HOW WE PROTECT THE PRIVACY OF CHILDREN ONLINE:

Our Services may not be used by anyone under the age of sixteen (16). Our Services are not intended for or directed to minors or children and no part of our Services are designed or intended to attract anyone under the age of 16. We will never ask for or knowingly collect information from children. If you are under the age of 16, you are not permitted to use the Services and should immediately exit our Services. Consistent with the Children's Online Privacy Protection Act, we will not knowingly collect any information from individuals under the age of 16. If you think that we have collected Personal Information from a child under the age of 16 through the Services, please contact us using the email indicated in the Contact Us section below and we will dispose of the information.

#### **INFORMATION RETENTION:**

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was collected. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide Services to you (for example, for as long as you remain an active Subscriber or Participant and the length of time thereafter during which we may have a legitimate need to reference your Personal Information to address issues that may arise;
- Whether there is a legal obligation to which we are subject; or
- Whether retention is allowed by applicable law (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

When we no longer need to process your Personal Information for the purposes set out in this Privacy Policy, we will delete your Personal Information from our systems.

#### **SECURITY:**

Stellar MLS uses technical, administrative, and physical measures to protect your Personal Information against accidental or intentional destruction, loss, alteration, unauthorized disclosure, or access and against other unlawful forms of collecting and processing. Stellar MLS follows industry standards and practices to help protect the confidentiality and integrity of your Personal Information that is collected and processed.

#### THIRD-PARTY SERVICES:

In general, the third-party providers used by us, will only collect, use and disclose your Personal Information to the extent necessary to allow them to perform the Services they provide to us. However,

certain third-party service providers, may have their own privacy policies for information they collect. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your information will be handled by these providers.

Our Services may also contain links to other websites, applications, and services maintained by third parties in which case the privacy policy of such third party applies and this Privacy Policy does not apply. The information practices of such other services are governed by the third-party privacy policies, which we encourage you to review to better understand those third parties' privacy practices.

#### **ELECTRONIC MARKETING AND COMMUNICATIONS:**

From time-to-time Stellar MLS or our third-party service providers with whom we collaborate and contact with, may use your Personal Information, such as your name, email address or phone number to contact you with promotional materials, newsletters, marketing or other information related to our Services that may be of interest. We may contact you in this way based on our legitimate interest in undertaking marketing activities to provide you with the most up-to-date information on our Services. By providing your contact information you have opted-in to receive marketing and commercial information by means of electronic communication, including email and text message (with proper consent). We will always obtain your prior express written consent before sending you any SMS messages, when required by applicable law.

Your use of our SMS communications is subject to our separate SMS policy (the "SMS Policy"), which outlines how we collect, use and protect information related to SMS communications, as well as your rights and choices regarding such messages. By opting into receiving SMS communications from Stellar MLS, you acknowledge and agree to the terms of the SMS Policy, which are incorporated by reference into this Privacy Policy.

You can withdraw your consent to receive any direct email marketing communication from us by sending an email to the address identified in the <u>Contact Us</u> section below or by following the opt-out instructions in our email communications. Please note that you may not be able to unsubscribe from non-transactional emails, such as billing and scheduling requests.

#### **CAN-SPAM ACT:**

We are committed to being compliant with the Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003 ("CAN-SPAM Act"). All e-mails you receive from our Stellar MLS or through the Services are intended to fully comply with the CAN-SPAM Act.

## YOUR ACCESS TO AND CONTROL OVER YOUR PERSONAL INFORMATION:

### Consent.

In certain states we may be required to obtain your consent prior to collecting and using certain of your Personal Information. We will request your consent prior to collection such Personal Information when applicable. Otherwise by submitting your Personal Information to us, you agree that we may collect, use, and disclose such Personal Information as set forth in this Privacy Policy and as permitted or required by law. If you wish to withdraw consent, please contact us at legal@Stellarmls.com.

### **Choices Related to Opting-Out.**

• *Email:* By using our Services, you agree that we may contact you by email as set forth herein. If you do not want to receive marketing and promotional emails from us, you may click on the

- "unsubscribe" link in the email to unsubscribe and opt-out of marketing email communications or contact us using the information contained in the <u>Contact Us</u> section below.
- Text Messages: By using our Services, and expressly opting-in to receive SMS messages, you agree to be reached by text message or SMS message. If you no longer want to receive text messages from us, reply STOP (or as otherwise instructed) in the text message, or contact us using the information contained in the Contact Us section below.

### **INTERNATIONAL VISTORS:**

The Website is not specifically intended or marketed to individuals outside of the United States. While the Website may be accessible outside of the United States, it does not intentionally target or advertise to individuals outside of the United States. If you are visiting the Website from outside the United States, please be aware that Stellar MLS is based in the United States, and the information we obtain through the Services will be transferred to, processed in, and stored on our servers in the United States and other countries where our service providers operate. The data protection laws and regulations applicable to your Personal Information transferred to the United States and such other countries may be different from the laws in your country. By using the Website, you consent to Stellar MLS's data collection practices as outlined herein.

#### ADDITIONAL STATE SPECIFIC PRIVACY RIGHTS:

### Your Rights Regarding Your Personal Information.

You may be able to exercise certain privacy rights depending on the state in which you reside. The rights available to you depend on our reason for processing your Personal Information and the requirements of applicable law. Your rights will vary depending on what state you are located in, and whether or not the applicable state laws apply to us. Specifically, you may have the following rights:

Right to Access and Right to Know.

You may be able to request access to a copy of the Personal Information that we have about you, including a list of categories of your Personal Information that we have collected and used over the past 12 months. We will provide to you the following information (to the extent required by law):

- The categories of Personal Information we have collected about you.
- The categories of sources from which we collect your Personal Information.
- The business or commercial purpose for collecting or selling your Personal Information.
- The categories of third parties with whom we share your Personal Information.
- The specific pieces of Personal Information we have collected about you.
- The categories of Personal Information that we have disclosed for a business purpose, along with the category of any other company we shared it with.
- The categories of Personal Information that we have sold, along with the category of any company we sold it to. If we have not sold your Personal Information, we will say so.

Right to Correct Incomplete, Inaccurate, or Out-of-date Personal Information.

You may have the right to request that we correct any Personal Information about you that is inaccurate, by submitting a verifiable consumer request. Depending on the purpose of the processing, you also have the right to request that we complete the Personal Information we hold about you where you believe it is incomplete, including by means of providing a supplementary statement.

Right to Personal Information Portability.

Consistent with applicable law and subject to certain exceptions, you may have the right to request that we transfer the Personal Information we have collected about you to another organization, or directly to you, in a structured, commonly used, and machine-readable format, under certain conditions.

### Right to Request Anonymization, Blocking, or Deletion of Personal Information.

You may have the right to request the deletion of your Personal Information we have collected from you, subject to certain conditions and limitations under the law. Once we receive a request, we will delete (to the extent required by law) the Personal Information we retain about you and direct any service providers to do the same. If we determine that an exception applies, we will inform you of the reason for denying the deletion request. In some cases, deletion may be accomplished through de-identification.

Please understand that if you request us to delete your Personal Information, our subsequent removal of such Personal Information may impact your ability to use our Services and may limit your use of or participation in our Services that require your Personal Information.

### Right to Revoke Consent.

Where we rely on your consent to process your Personal Information, you may have the right to withdraw that consent at any time with future effect. Depending on where you are located, you may also have the right to request deletion of Personal Information that was processed based on your consent, or the right to know the consequences of revoking your consent. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

# Right to Object to Automated Decision-Making/Profiling.

You may have the right to object to our processing of your Personal Information, under certain conditions, and we can be required to no longer process your Personal Information. Such right to object may apply if we collect and process your Personal Information through automated decision making, such as profiling, to better understand your interests in our products and services or for direct marketing. If you have a right to object and you exercise this right, your Personal Information will no longer be processed by us for such purposes. Such a right to object may, in particular, not exist if the processing of your Personal Information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

#### Right to Opt-out of the Sale of Personal Information.

You may have the right to opt-out of the sale of your Personal Information that we have collected from you. If you would like to opt-out, please contact us at the email address contained in the <u>Contact Us</u> section below.

Right to Opt-out of Sharing of Personal Information for Certain Processing (Profiling/Targeted Advertising).

Consistent with applicable law, you may have the right to opt-out of having your Personal Information shared for purposes of targeted advertising. You may also have the right to request further information about the disclosure of your Personal Information for those third parties' marketing purposes, such as the contact information of those parties, once per calendar year. If you would like to opt-out, please contact us at the email address contained in the <u>Contact Us</u> section below.

#### Right to Limit the Use and Disclosure of Sensitive Personal Information.

We will only use sensitive or special Personal Information as needed for the purposes for which it was collected or with your consent. We do not currently process sensitive Personal Information for purposes that may be limited under applicable law. If this changes, we will notify you, and you may have the right to opt-in to the processing of such sensitive Personal Information.

Right to Non-discrimination for Exercising a Privacy Right.

We will not discriminate against you for exercising any rights. This generally means we will not deny you goods or services, charge different prices or rates, provide a different level of service or quality of goods, or suggest that you might receive a different price or level of quality of goods.

### Right to Disclosure of Direct Marketers.

You may have a right to request the categories and names/addresses of third parties that have received Personal Information for their direct marketing purposes upon simple request, and free of charge, if any.

## **Exercising your Rights; Verification of Requests.**

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child. Certain states require that we verify the identity of each person who makes a request to know what Personal Information we have about you or to delete the Personal Information we have about you.

In some regions you may request this information no more than two times in a rolling twelve-month period. When you make this request, the information provided may be limited to Personal Information we collected about you in the previous 12 months.

All requests must provide sufficient information to allow us to reasonably verify you are the person whom we collected Personal Information about or an authorized representative of such person. We will respond to your verifiable request within the prescribed timelines. We will only use the information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. Please describe your request with sufficient detail to allow us to properly respond to it. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

#### Appeals.

If we deny your verifiable request to exercise your applicable privacy rights on your behalf, in some locations you may have the right to appeal our decision. To initiate an appeal, please submit a written request to us within thirty (30) days of receiving our denial notice. We will review your appeal and respond within thirty (30) days of receipt of your appeal. If your appeal is denied, we will provide an explanation for the denial and inform you of any further rights you may have.

#### **De-Identification.**

Consistent with applicable law, we commit to maintain and use anonymized information in de-identified form and not to attempt to re-identify the information, except that we may attempt to re-identify the information solely for the purpose of determining whether its de-identification processes satisfy the requirements of applicable state laws.

## Do-Not-Track Disclosures; Third-Party Tracking.

Certain mechanisms may allow you to send web browser signals, known as "Do Not Track" ("DNT") signals, indicating your choice to disable tracking on websites. We do not respond to browsers do not track signals currently. We may not be aware of or able to honor and respond to every such mechanism. More information about "do not track" is available at www.allaboutdnt.org concerning such information. Third parties, other than our service providers and vendors, do not have authorization from us to track which websites, or other online services you visit prior to and after visiting our websites. Please note, however, that we cannot control third-party tracking and there may be some third-party tracking that occurs without our consent or knowledge.

## Shine the Light Request.

California Civil Code § 1798.83 permits residents of California to request from Stellar MLS a notice disclosing: (1) the categories of Personal Information we have shared with third parties, if any, for the third parties' direct marketing purposes, during the preceding calendar year, and (2) the names and addresses of those third parties. To submit a shine the light request, please contact us by using the contact details in the "Contact Us" section below.

### **CHANGES TO OUR PRIVACY POLICY:**

We reserve the right to change the terms of this Privacy Policy at any time by posting those changes to this Privacy Policy, so that you are always aware of our processes related to collection, use and disclosure of your Personal Information. For significant changes, we will notify you by posting a prominent notice on our Website or emailing you indicating when the Privacy Policy was most recently updated. Please consult this portion of the Website regularly for important changes to the Privacy Policy as they occur.

#### **CONTACT US:**

To ask questions or comments about this Privacy Policy and our privacy practices, or to exercise any of your rights, contact us using any of the following methods:

#### Stellar MLS

247 Maitland Avenue, Suite 2000 Altamonte Springs, FL 32701 Tel: (407) 960-5300

Fax: (407) 960-5450 legal@Stellarmls.com

LAST UPDATED: November 6, 2025.