

LERETA PRIVACY POLICY

Last Updated: April 16, 2021

NOTICE

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY ACCESSING THIS WEBSITE, YOU AGREE TO BE BOUND BY THE PRIVACY POLICY BELOW. IF YOU DO NOT AGREE TO THE PRIVACY POLICY BELOW, DO NOT ACCESS THIS WEBSITE. By accepting this Privacy Policy, you also agree to our Terms of Use, which also governs your visit to this website and which is incorporated by reference into this Privacy Policy.

PRIVACY POLICY

Your privacy is important to LERETA, LLC (“LERETA,” “we,” or “us”). We have prepared this Privacy Policy to provide you with information about how we collect, use, share, and protect your personal information. This Privacy Policy applies to the collection, use, and sharing of personal and other information through the website, www.lereta.com, and the customer portal, www.leretanet.com, totalflood.com, rpm.icgtax.com, and any other LERETA websites where we have posted this Privacy Policy (the “Services”).

INFORMATION COLLECTION

Information You Provide: We collect information about you (“personal information”) and your use of the Services, some of which may be personally identifiable and some of which may not be personally identifiable. We collect any information that you provide to us through your access to or use of the Services. This includes, but is not limited to, your personal information such as:

- Identifiers such as real name, unique personal identifier, online identifier, Internet Protocol address, or other similar identifiers;
- Postal or property address, loan information, and financial account information such as outstanding mortgage loan balance;
- Commercial information, including records of products or services purchased, obtained, or considered;
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet website, application, or advertisement;
- Audio, electronic, visual, or similar information; and
- Contact information or account information you may provide for us to respond to an inquiry you make.

We also collect technical information about your use of the Services, which may include information about your device, web browser, and location. When you use the Services, your IP address (the Internet Protocol address of your device) is recorded so that we may know how you are using the Services. Your browser may also automatically provide us with information regarding the type of computing device and operating system you are using.

The Services use cookies to record user-specific information about the pages you access or actions you take during your visit to the Services. These cookies do not store or collect any personally identifiable data. Please see the section below on Tracking Technologies for more information.

INFORMATION USES

We may use the information that we collect:

- To carry out our contractual obligations to provide services to your company;
- To monitor and improve the Services;
- For authentication purposes when you call us for customer support;
- To respond to your inquiries, questions, or other requests;
- To comply with legal obligations;
- To protect against deceptive, fraudulent or illegal activity;
- To detect, prevent, and respond to security incidents;
- To enhance your experience with us, such as tailoring the Services' content to your preferences or developing new products or services based on your interactions with the Services;
- To send you information about products or services that we think may be of interest to you;
- To carry out any specific purposes for which we have obtained your prior consent; or
- To conduct any other legitimate business activities not otherwise prohibited by law.

INFORMATION SHARING

We may share information that we collect with relevant and appropriate third parties in the following situations:

- To the companies, including lending institutions and mortgage servicers, with whom we contract to provide services;
- To unaffiliated third parties with whom we contract to assist us in performing services for our clients;
- To unaffiliated third parties providing services to government agencies or as may be necessary for us to provide the services your company has requested of us;
- To law enforcement or other governmental authorities in connection with an investigation;
- In response to legal process, civil or criminal subpoenas, court orders, or discovery;
- To satisfy or comply with applicable laws or regulations;
- To exercise or defend legal claims;
- With our auditors;
- To government agencies, such as tax assessors, in connection with performing our services on behalf of our clients;
- As directed by our clients;
- To other parties to whom you or your authorized agent give consent to us to share your information;

- In the event that LERETA goes through a business transition or corporate transaction, such as a merger, capital investment, acquisition by another company, or sale of all or a portion of its assets; or
- To conduct any other legitimate business activities not otherwise prohibited by law.

Notwithstanding the information sharing described above, we may share aggregate or non-personally identifying information about the users of the Services with third parties for marketing, advertising, research, or other business purposes.

We do not sell personal information.

INFORMATION SECURITY

LERETA attempts to protect against the loss, misuse, and alteration of your personal information. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. Our servers are protected by reasonable physical, technical, and administrative security measures. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to protect your personal information, we cannot guarantee its absolute security.

CUSTOMER PORTAL

To protect the security of your information, we may require you to authenticate your identity (*i.e.*, prove that you are who you say you are) to conduct certain transactions via the Services. Use of unique login information may be required to access certain portions of the Services. You acknowledge that your login information is unique, and must be kept private and confidential to protect the security of your account. You agree not to give or make available your login information to any unauthorized individual. If you believe your login information has been compromised, lost or stolen, someone without authorization has attempted to use your account, or your account has been accessed by someone without authorization, you must notify us immediately (using the contact information below). If you lose or forget your login information, contact us immediately. If you fail to notify us, you may be liable for all unauthorized activity on your account.

THIRD PARTY LINKS

The Services may display links to third-party websites. By including a link to third-party websites, LERETA does not endorse or recommend any products or services offered or information contained at the third-party websites. LERETA disclaims liability for any privacy practices of the third-party websites linked on the Services, which may have a privacy policy different from that of LERETA. If you decide to visit a third-party website via a link displayed on the Services, you do so at your risk.

TRACKING TECHNOLOGIES

We may also collect information during your visit to the Services through our online tracking technologies, which may include cookies, web beacons, digital fingerprints, embedded Web

links, and other information-gathering tools. These tools collect certain traffic information that your browser automatically sends, such as your browser type and language, access times, and the address of the website from which you arrived. They may also collect information about your Internet Protocol (“IP”) address, click stream behavior (*e.g.*, the pages you view, the links you click, and other actions you take in connection with the Services or “powered by” websites) and product information. For example, some pages made available via the Services use cookies so that LERETA can better serve you when you return to the Services. For more information about cookies, please visit www.allaboutcookies.org.

For example, we use Google Analytics to generate statistical and other information about the performance of the Services by means of cookies. To learn more about Google’s privacy policy, please visit: <http://www.google.com/policies/privacy/>. You can also learn more about how to opt out of the collection and processing of such information by Google by visiting this website: <https://tools.google.com/dlpage/gaoptout>.

In addition to session based cookies (*i.e.*, cookies that stored information in a temporary memory location that is deleted when you end your session or close your web browser), LERETA may utilize persistent cookies for analytics purposes. These persistent cookies, which may be our own first-party cookies or third-party cookies of our service providers, help us better analyze and customize our users experience and the performance of the Services.. These third parties may collect personally identifiable information about your online activities over time and across different websites when you use the Services. You have the right to opt out of behavioral and interest based marketing. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. In addition to opting out of cookies directly through your browser, you can view and opt out of cookies that are currently on your browser by visiting the following websites: <http://www.aboutads.info/choices> or <http://www.networkadvertising.org/choices>. However, please note that disabling cookies may prevent you from taking advantage of certain features on the Services.

Even if you disable tracking, keep in mind that you may still receive interest-based advertising from third parties with whom your information had been previously disclosed or advertising from third parties that is not based on your interests and preferences.

The Services do not respond to browser “Do Not Track” signals.

AGE RESTRICTIONS

The Services are not intended for use by children or minors. We do not knowingly solicit information from children under 13 years, and we do not knowingly market to children. Please notify us immediately if you believe that we may have collected personal information from a child, so that we can delete such information.

FOR CALIFORNIA RESIDENTS ONLY

For information regarding our privacy practices as a service provider under the California Consumer Privacy Act (“CCPA”), please see our [CCPA Privacy Notice](#).

PRIVACY POLICY CHANGES

We reserve the right to change this Privacy Policy at any time without notice to you. Unless otherwise stated, any modifications to this Privacy Policy will go into immediate effect after they have been posted, as indicated by the “Last Updated” date located at the beginning of this Privacy Policy. Your continued use of the Services indicates your consent to the Privacy Policy posted at the time of use.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at ContactUs@LERETA.com.