

Bottom line, we take matters of privacy and information seriously. Please read the following to learn more.

This Privacy Policy describes the policies and procedures of **TopCO Realty**. (“we”, “our” or “us”) on the collection, use and disclosure of your information on **topcorealty.com** (the “Site”) and the services, features, content or applications we offer (collectively with the Site, the “Services”). We receive information about you from various sources, including: (i) if you register for the Site and the Services, through your user account on the Services (your “Account”); (ii) your use of the Services generally; and (iii) from third party websites and services. When you use the Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy.

## **SECTION 1 - WHAT INFORMATION IS COLLECTED AND WHAT DO WE DO WITH IT?**

**Information You Give Us:** Information collected from you will vary, depending on how you access, visit, use or otherwise take advantage of the Site and what information you may choose to provide to us (whether through email or otherwise).

It may be possible to browse various sections of the Site without submitting any Personal Information. “Personal Information” means individually identifiable information about you that we collect online or otherwise through the Sites, including, but not limited to, your full name, a user name and password, email address, phone number, physical address, or, for certain e-commerce transactions your credit card information. Information in a form that is aggregated with other information, anonymized or otherwise processed so as not to be reasonably identifiable with you, and information in a form that otherwise is detached, combined, organized, segmented, modified or processed so as not to be reasonably capable of being associated with you, will not be considered Personal Information, and will not be restricted by this Privacy Policy as to use, sharing or otherwise.

If you access, visit, use or otherwise take advantage of certain of our products and/or services, or certain of our tools, Sites or Site functionality, we may receive or you may be asked to provide Personal Information. Whenever we ask for Personal Information, we strive to provide a link to this Privacy Policy to help you understand how Personal Information will be used before you decide whether to disclose it. You can choose not to provide us with Personal Information, but then

you may not be able to fully take advantage of certain features of our Sites and we may not be able to provide you with certain requested information, products and/or services.

**Automatic Collection of Information:** Like many Web sites or media on the Internet, when you browse our Site, we also automatically receive your computer's internet protocol (IP) address in order to provide us with information that helps us learn about your browser and operating system.

This is for various reasons, including to help us (i) better understand, offer, operate, improve and modify the Sites, (ii) better understand how the Sites are used and experienced and (iii) enhance, or better understand how we can enhance, your or others' overall experience on one or more of the Sites, including providing advertising and other information that is relevant to you.

This tracked or automatically gathered information may include, among other things, your device's IP address, identification number or location, the URLs and Site pages you've visited, sections of or content on Site pages on which you click or in which you are interested, the number of times you visit each Site page, what downloads and/or search queries you have made, when emails are opened or links are clicked, how long you spent on particular sections of each Site and on each Site generally, and information about your computer, browser or operating system type. This automatically gathered data includes information provided through the use of "cookies" (which is described in more detail below) and other technology or methods and may also include information gathered in connection with your use of third-party Web sites and media (for example, through the use of "web beacons," "clear GIFs" or "pixels"). Although not restricted by this Privacy Policy, we may also gather and use information, generated our self or obtained from others, derived from or based on information you have provided or that is obtained by way of the collection means referred to in this Privacy Policy (e.g., automatically).

**Information from Cookies:** Cookies are small files that we or others send to and store on or with your computer so that your computer, browser, mobile app or other application can be recognized as unique the next time you access, visit, use or otherwise take advantage of the Site or other media. Cookies may also reflect demographic data pertaining to you or other data linked to information you submit. One use or consequence of cookies is to enable you to receive customized ads, alerts, content, services or information. You are always free to decline any cookies we use by adjusting the settings of your browser, as your

browser may permit; however, some products, services or features might not be available or operate properly if cookies are not enabled.

Some of our advertisers and third-party service providers may also utilize their own cookies. You may be able to opt-out of third-party cookies, or learn more, by going to [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp). In addition, we, our service providers and others sometimes use “web beacons” or “clear GIFs.” These perform statistical and administrative functions, such as ascertaining and measuring site and page traffic, verifying advertising paths, better understanding user interests and activity, gathering related information (such as information relating to a particular browser, device or IP address) and positioning images, and typically do so without detracting from your online experience. Web beacons and clear GIFs are not necessarily designed to collect Personal Information. In addition, if you have provided your email address, we might use a non-human unreadable form (or “hash”) of your email address to deliver, or facilitate delivery of, relevant advertisements and information to you on or by way of the Sites or on or by way of other Web sites or media, including, for example, popular social media sites and features.

Email marketing (if applicable): With your permission, we may send you emails about our Site and other updates.

## SECTION 2 - CONSENT

How do you get my consent? When you provide us with personal information to access information, send us a message via contact form, complete a transaction, verify your credit card, place an order, arrange for a delivery or return a purchase, we imply that you consent to our collecting it and using it for that specific reason only.

If we ask for your personal information for a secondary reason, like marketing, we will either ask you directly for your expressed consent, or provide you with an opportunity to say no.

How do I withdraw my consent? If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at anytime, by contacting us at [topcorealty.com](http://topcorealty.com).

## SECTION 3 - DISCLOSURE

We may disclose your personal information if we are required by law to do so or if you violate our Terms of Service.

## **SECTION 5 - THIRD-PARTY SERVICES**

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

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

Once you leave our Site's website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

Links: When you click on links on our Site, they may direct you away from our Site. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements.

## **SECTION 6 - SECURITY**

To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed.

If you provide us with your credit card information, the information is encrypted using secure socket layer technology (SSL) and stored with a AES-256 encryption. Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all PCI-DSS requirements and implement additional generally accepted industry standards.

## **SECTION 7 - COOKIES**

As described previously, cookies are pieces of text that may be provided to your computer through your web browser when you access a website. Your browser stores cookies in a manner associated with each website you visit. We use cookies to enable our servers to recognize your web browser and tell us how and when you visit our Site, share our content, and otherwise use the Services through the Internet.

We may use cookies and other automated data collection means to identify that your web browser has accessed aspects of the Services and may associate that information with your Account if you have one, the device you use to connect to the Services, or email or social media accounts that you use to share our content.

Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave cookies active, because they enable you to take advantage the most attractive features of the Services.

This Privacy Policy covers our use of cookies only and does not cover the use of cookies by third parties. We do not control when or how third parties place cookies on your computer. For example, third party websites to which a link points may set cookies on your computer.

## **SECTION 8 - AGE OF CONSENT**

By using this Site, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have given us your consent to allow any of your minor dependents to use this Site.

## **SECTION 9 - CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

If our Site is acquired or merged with another company, your information may be transferred to the new owners so that we may continue to sell products to you.

## **QUESTIONS AND CONTACT INFORMATION**

If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information contact our Privacy Compliance Officer at