



## **PRIVACY POLICY**

You should know generally that we zealously protect the privacy of our clientele: we do not “share”, sell, publish, disclose, discuss, reveal, “leak”, or profit in any way from the identities and other confidential information of our clients; we do not reveal the identities or confidential information of our clients to other clients; we contractually agree in writing to comprehensive non-disclosure with every client; all employees and principals of LRI contractually agree with the LRI broker to comprehensive non-disclosure; and third-party website administrators contractually agree with LRI to comprehensive non-disclosure.

Incidental to our services and operating the interactive portion of our website, we collect the following types of information about you:

*Information you provide us directly:*

We ask for certain information such as your username, real name, birth date, address, phone number and e-mail address when you register for an LRI account, or if you correspond with us. We may also retain any messages you send through the website, and may collect information you provide in User Content you post to the website. We use this information to operate, maintain, and provide to you the features and functionality of the website.

*Information we may receive from third parties:*

We may receive information about you from third parties. For example, if you access our website through a third-party connection or log-in, for example, through Facebook Connect, by “following,” “liking,” adding the LRI application, linking your account to the website, etc., that third party may pass certain information about your use of its service to LRI. This information could include, but is not limited to, the user ID associated with your account (for example, your Facebook UID), an access token necessary to access that service, any information that you have permitted the third party to share with us, and any information you have made public in connection with that service. If you allow us access to your friends list, your friends’ user IDs, and your connection to those friends, may be used and stored to make your experience more social, and to allow you to invite your friends to use our service as well as provide you with updates if and when your friends join us. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to the LRI website.

### *Inviting a friend to use our website:*

LRI may, in its sole discretion, develop a feature that allows you to invite third parties to use our website. If you choose to use our invitation service to invite a third party to do so through an “Invite friends” feature, you may directly choose a friend to invite through your mobile device’s native contact list – but we do not require that you import your contacts list to us, and we do not retain the information contained in your contacts list. You understand that by inviting a friend to use LRI’s website through the “Invite friends” feature, you are directly sending a text or email from your personal accounts and that we are not storing your contact list. In addition, you understand and agree that normal carrier charges apply to communications sent from your phone. Since this invitation is coming directly from your email or phone, we do not have access to or control this communication.

### *Finding your friends on our website:*

We do not now allow, and we will not ever allow, directly or indirectly, access to information about any of our clients, even if you invited them to use our website.

### *Analytics information:*

We may directly collect analytics data, or use third-party analytics tools and services, to help us measure traffic and usage trends for our website. These tools collect information sent by your browser or mobile device, including the pages you visit and other information that assists us in improving our services. We collect and use this analytics information in aggregate form such that it cannot reasonably be manipulated to identify you or any other particular individual user.

### *Cookies information:*

When you visit our website, we may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use our website (e.g., the pages you view, the links you click and other actions you take on the website), and allow us or our website administrators to track your usage over time. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser’s directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of our website may not function properly if the ability to accept cookies is disabled.

### *Log file information:*

Log file information is automatically reported by your browser or mobile device each time you access our website. When you use our website, our servers automatically record certain log file information. These server logs may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the website, domain names, landing pages, pages viewed, and other such information.

### *Device identifiers:*

When you access the website by or through a mobile device (including but not limited to smart-phones or tablets), we may access, collect, monitor and/or remotely store one or more “device identifiers,” such as a universally unique identifier (“UUID”). Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device’s operating system or other software, or data sent to the device by LRI. A device identifier may convey information to us about how you browse and use the website. A device identifier may remain persistently on your device, to help you log in faster and enhance your navigation through the website. Some features of the website may not function properly if use or availability of device identifiers is impaired or disabled.

### *Location data:*

When you access the website by or through a mobile device, we may access, collect, monitor and/or remotely store “location data,” which may include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device. Location data may convey to us information about how you browse and use the website. Some features of the website, particularly location-based services, may not function properly if use or availability of location data is impaired or disabled.

*Commercial and marketing communications for LRI exclusively:*

We use the information we collect or receive, such as your email address, to communicate directly with you. We may send you emails containing newsletters, promotions, and special offers. If you do not want to receive such email messages, you will be given the option to opt out or change your preferences. We also use your information to send you service-related emails (e.g., account verification, purchase and billing confirmations and reminders, changes/updates to features of the website, technical and security notices). You may not opt out of service-related emails.

*Use of certain service type information we collect about you:*

We use or may use cookies, log file, device identifiers, location data and clear gifs information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the website; (b) provide custom, personalized content and information; (c) to provide and monitor the effectiveness of our service; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems; (f) help you efficiently access your information after you sign in; (g) to provide advertising to your browser or device, and (h) automatically update the LRI application on your mobile devices.

## **Sharing of Your Information**

We will not not “share”, sell, publish, disclose, discuss, reveal, “leak”, or profit in any way your information to anyone without your consent, except as noted below:

- Who can see User Content: Only LRI will have access to information provided to LRI once logged in to the password protected members area. Any User Content that you voluntarily disclose for posting to the website publically and/or any social media apps we use becomes available to the public and cannot be removed, except by LRI in its sole discretion. Once posted on social media apps, User Content may not be removable from public view, as copies may remain viewable in cached and archived pages of the website, on other sites that have republished us, or if other Users have copied or saved that information. If you do not wish your User Content to be available to the public, please don't post it.

*What happens in the event of a change of control:*

We may buy or sell/divest/transfer the company (including any shares in the company), or any combination of its products, services, assets and/or businesses. Your information such as customer names and email addresses, User Content and other user information related to our services may be among the items sold or otherwise transferred in these types of transactions. We may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of the company.

*Instances where we are required to share your information:*

We will disclose your information where required to do so by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security, quality or integrity of our service; and/or (c) to exercise or protect the rights, property, or personal safety of LRI, our Users, or others.

*Sharing certain service type information we collect about you:*

We may share certain service type information, including information obtained through tools such as cookies, log files, device identifiers, location data and clear gifs (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.): (i) with our website administrators. We may also aggregate or otherwise strip data of all personally identifying characteristics and may share that aggregated, anonymized data with third parties.

## **How We Store and Protect Your Information**

*Storage and Processing:*

Your information collected through the website may be stored and processed in the United States or any other country in which LRI or its service providers maintain facilities.

### *Keeping your information safe:*

LRI cares about the security of your information, and uses commercially reasonable safeguards to preserve the integrity and security of all information collected through the website. To protect your privacy and security, we take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from LRI, at all times. However, LRI cannot ensure or warrant the security of any information you transmit to LRI or guarantee that information on the website may not be accessed, disclosed, altered, or destroyed. Your privacy settings may also be affected by changes to the functionality of third party sites and services that you add to our services, such as social networks. LRI is not responsible for the functionality or security measures of any third party.

### *Compromise of information:*

In the event that any information under our control is compromised as a result of a breach of security, LRI will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable contracts, laws and regulations.

## **Your Choices about Your Information**

You control your account information and settings: You may update your account information and email-communication preferences at any time by logging in to your account and changing your profile settings. You can also stop receiving promotional email communications from us by notifying us at [bill@lawyersrealtyinternational.com](mailto:bill@lawyersrealtyinternational.com).

We make every effort to promptly process all unsubscribe requests. As noted above, you may not opt out of Service-related communications (e.g., account verification, purchase and billing confirmations and reminders, changes/updates to features of the Service, technical and security notices). If you have any questions about reviewing or modifying your account information, you can contact us directly at [bill@lawyersrealtyinternational.com](mailto:bill@lawyersrealtyinternational.com).

### *Opting out of collection of your information for Tracking / Advertising:*

Please refer to your mobile device or browser's technical information for instructions on how to delete and disable cookies, and other tracking/recording tools. Depending on your type of device, it may not be possible to delete or disable tracking mechanisms on your mobile device. Note that disabling cookies and/or other tracking tools prevents LRI from tracking your browser's activities in relation to the website, and doing so may disable many of the features available through the website. If you have any questions about opting out of the collection of cookies and other tracking/recording tools, you can contact us directly at [bill@lawyersrealtyinternational.com](mailto:bill@lawyersrealtyinternational.com).

*How long we keep your private profile information:*

Following termination of your User account, LRI may retain your private profile information for a commercially reasonable time for backup, archival, or audit purposes. For the avoidance of doubt, any information that you choose to make public on the service may not be removable.

## **Children's Privacy**

LRI does not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register as Users. The website and its content are not directed at children under the age of 13. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at [bill@lawyersrealtyinternational.com](mailto:bill@lawyersrealtyinternational.com).

## **Links to Other Websites and Services**

We are not responsible for the practices employed by websites or services linked to or from our website, including the information or content contained therein. Please remember that when you use a link to go from the website to another website, our Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link or advertisement on our website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and we do not control over any third-parties that you authorize to access your User Content. If you are using a third-party website or service (like Facebook, Google groups, or an IRC chatroom) and you allow such a third-party access to you User Content you do so at your own risk. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources other than through our website.