Privacy Statement

This Privacy Statement ("Privacy Statement") applies to this website and other websites, mobile applications, other online products and services (collectively, the "Sites") operated by Bright MLS ("Bright," "we," "us," and "our"). This Privacy Statement also explains the choices you have about the way this information is collected and used.

Please read this Privacy Statement carefully because by registering for or using the Sites, you agree to be bound to this Privacy Statement, which is incorporated into our Terms of Use, available by clicking on the "Terms of Use" link located in the footer section of the Sites ("Terms of Use"). We encourage you to periodically review this Privacy Statement to keep up to date on how we are handling your personal information.

Please note the arbitration provision set forth below, requiring you to arbitrate any claims you may have against Bright on an individual basis. ARBITRATION ON AN INDIVIDUAL BASIS MEANS THAT YOU WILL NOT HAVE, AND YOU WAIVE, THE RIGHT FOR A JUDGE OR JURY TO DECIDE YOUR CLAIMS, IF ANY, AND THAT YOU MAY NOT PROCEED IN A CLASS, CONSOLIDATED OR REPRESENTATIVE CAPACITY.

The Types of Personal Information We Collect

When you use our Sites, we collect your personal information. The types of personal information we collect from you depends on the Sites and the features you use on the Sites. "Personal information" is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, device, or household. This information may include:

- Account Information and Identifiers. We may collect information from you when you sign up for a membership, register for an account with us, or have your information submitted on your behalf by an agent. That information may include identifiers, such as your full name, email addresses, age, birthday, username, password, phone numbers, professional information including license numbers, and other information you provide. We collect this information directly from you, indirectly from you (e.g., from observing your actions on our Sites), or from third party service providers, such as data analytics providers. We may disclose this information to third parties, such as advertising networks, internet service providers, data analytics providers, operating systems and platforms, payment processors, and social networks to fulfill or meet the reason you provided the information or for marketing purposes.
- Payment and Financial Information. We collect payment information directly from you, such as your payment card number, expiration date, billing address, and payment account name. We do not store this information. We use a third-party payment processing company who receives this information to process any payments.
- Commercial Information. We collect commercial information, including records of personal property, products or services purchased, obtained, or considered, directly from you or from third parties that maintain this information in official records. We use this information for marketing or to fulfill or meet the reason you provided the information, e.g., to provide our products and services to you, targeted

advertising, or to respond to a request. We disclose this information for business purposes to third party agents, payment processors, order fulfillment service providers, and advertising networks.

- Demographic Information. We may collect your demographic information and protected classification characteristics, such as your age, gender, city, state, and country. We collect this information directly from you. We may disclose this information to third parties, such as advertising networks, data analytics providers, social networks, or payment processors to fulfill or meet the reason you provided the information, for marketing purposes, or to improve our Sites (e.g., to tailor our Sites to the interests of our users or measure traffic within our Sites).
- Internet or Other Similar Network Activity Information. We may collect data about how you and your devices interact with the Sites. This could include features you use, the web pages you visit, and the search terms you enter. This could also include data about your devices and the network you use to connect to our services, including IP address, device identifiers, and data about the performance of the services you use on the Sites and any problems you experience with them. We collect this information indirectly from you, e.g., from observing your actions on our Sites. We use this information for marketing, to fulfill or meet the reason you provided the information, or to improve our Sites (e.g., to tailor our Sites to the interests of our users, measure traffic within our Sites, and to improve our products and services). We may disclose this information to third parties, such as advertising networks, internet service providers, data analytics providers, operating systems and platforms, fraud screening services, and social networks.
- Location and Geolocation Information. We may collect your location information. This information may help us provide recommendations to you based on your location, serve you with advertisements, or direct you to a product or service that we believe may be of interest to you. We collect this information directly from you or indirectly from you (e.g., from observing your actions on our Sites). We may disclose this information to third parties, such as advertising networks, internet service providers, data analytics providers, or operating systems and platforms to fulfill or meet the reason you provided the information or for marketing purposes.
- Professional or Employment-related Information. We may collect information about your employment history, professional certifications, associations, or license numbers. This information is used to fulfill or meet the reason you provided the information, process an employment application, or verify your qualifications, including where it is required to access relevant sections of our Sites. We may disclose this information to third parties, such as background check providers, human resources administrative service providers, advertising networks, data analytics providers, and social networks to fulfill or meet the reason you provided the information or for marketing purposes.
- Content and Other Information You Provide to Us. We collect additional content and information that you voluntarily provide us, such as when you submit a complaint or fine appeal form, submit an application to become a subscriber, register for or post an entry to our forum, or send us feedback. We use this information to improve our Sites, e.g., to tailor our Sites to the interests of our users and to improve our products and services. We may disclose this information to third parties, such as advertising networks, internet service providers, data analytics providers, operating systems and platforms, and social networks to fulfill or meet the reason you provided the information.
- Inferences From Other Personal Information. We may collect inferences drawn from other personal information to create a profile about you that reflects your preferences, characteristics, etc. We collect this information indirectly from you, e.g., from observing your actions on our Sites. We use this information to improve our Sites (e.g., to tailor our Sites to the interests of our users, measure traffic

within our Sites, and to improve our products and services). We may disclose this information to third parties, such as advertising networks, internet service providers, data analytics providers, operating systems and platforms, and social networks for marketing purposes.

We retain your personal information only for as long as necessary for the purpose for which it was collected.

You have choices about the information we collect. When you are asked to provide personal information, you may decline. But if you choose not to provide information that is necessary to provide a product or service, you may not be able to use some of our features, products, or services.

How We Collect Personal Information

Passive Collection

We may collect information passively, while you are visiting or interacting with the Sites. We call this "passive" collection since you may not know that this information is being collected when you visit or interact with the Sites. This information may consist of the following items: website visitors' IP address, IP address-related information, system Media Access Control address, network configuration information, network device information, browser plug-in type and versions, and operating system.

- Cookies, Web Beacons, and Similar Technologies. One particular way that we collect information passively is through cookies, web beacons, and other similar technologies. Cookies or web beacons serve to improve your experience when visiting the Sites. Cookies are small text files placed on your device that uniquely identify your device and which a website can transfer to a consumer's hard drive to keep records of his or her visit at a website. Web beacons are small pieces of information that are embedded in images on the pages of websites. We may use cookies, web beacons, or similar technologies to improve your experience on the Sites, such as remembering you when you return to the Sites, anonymously track interest in and collect aggregate information on the Sites, and analyze traffic patterns on the Sites. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but if you do, you may not be able to take advantage of personalized features on the Sites. Some of the cookies we use may be more persistent in nature. These persistent cookies may not be deleted when your cookies are deleted. Please check your browser and browser settings to determine where these types of cookies are stored and whether and how they may be deleted. The Network Advertising Initiative also offers a means to opt-out of a number of advertising cookies. Please visit www.networkadvertising.org to learn more. In any event, if you reject our cookies, you may still use the Sites, but you may be limited in some of the features. We may also work with service providers that use cookies and web beacons to collect information about your visits to the Sites and to other websites you may visit, and to serve advertisements to you across the Internet based on that information.
- Google Analytics. To help facilitate the delivery of relevant content, we use Google Analytics and have implemented all Google Advertising Features, including Remarketing, Impression Reporting, and Demographics, and Interest Reporting. Google Analytics uses cookies to report on user interactions on our and others' websites. We use the data collected for optimizing marketing, refining advertising and/or programming strategies, and generally making advertising more effective. Google

provides a complete privacy policy here: http://www.google.com/intl/en/analytics/privacyoverview.html and instructions on opting out of Google Analytics using a specific plug-in available at the following link: https://tools.google.com/dlpage/gaoptout. Note that this opt-out is specific to Google activities and does not affect the activities of other ad networks or analytics providers that we may use.

We may utilize other third party data analytics tools to identify how users engage with the Sites and to provide us with information regarding our users.

Direct Collection

We also collect information from you directly, at the time that you supply information to us via the Sites. For instance, if you contact us to subscribe to our membership and other products or services, ask questions, or provide us feedback about the Sites or any of our products or services, we may store your communications, including any personal information you include in them, so we can effectively respond to you. If you do not want us to directly collect your personal information, please do not provide it to us.

Other Sources

We may also collect or receive information from other sources including third-party information providers and third-party platforms, such as social media sites. This information may be used to supplement your profile and it will be combined with other information we collect.

How We Use the Personal Information We Collect

We use your information primarily as necessary to provide you with our products and services, including in one or more of the following ways:

- Customize User Experiences. We may use your personal information to create customized experiences, or to provide you information or services tailored to your interests and preferences. We may use your IP address and other similar information to make our websites easier to use and navigate as well as to personalize the content provided on the Sites.
- Communications. We also use your information to communicate with you and for you to communicate with other subscribers. We use your information to communicate with you about your membership, account, inquiries, our company, and related news, as well as to fulfill a request from you, and send you promotional emails, surveys, newsletters, or notifications.
- Product Improvement. If you choose to subscribe to our membership and other products, participate in our online services, or to register for other Bright products or services, we will collect the information that you disclose and analyze the data to discover new facts that could help us better understand our products and services. We may use this information for our internal business purposes, such as research to improve our products and analyses that may help us better market our products.
- Advertising, Marketing, and Promotions. We may use your information for generating web analytics to compile user information for marketing purposes, advertising, conducting marketing analysis,

providing you with recommendations for products or services based on your profile, and promotional material planning and distribution.

- Service and Websites Maintenance and Improvement. We may use the information about your use of our products and services, and your other activities on the Sites to monitor user traffic patterns and to try to analyze what our users prefer, so that we can design better products and services. We may analyze the information that is collected with cookies and other tracking technologies to help us improve our function and to modify the services and information that we provide. We may also use the information for fraud detection and other maintenance purposes to keep our Sites functioning and secure.
- Other Legitimate Business Reasons. We may also use your information for other legitimate business reasons.

With Whom & Why We Share Personal Information

We may share or disclose your personal information to the following categories of entities and for the following reasons:

- With third parties, to assist us in operating the Sites, conducting our business, processing payments, providing our services to you, and for our marketing and advertising purposes;
- With third party partners, such as associations, brokers, agents, and appraisers;
- With third parties to conduct a sweepstakes or other promotion;
- To third parties, for any corporate reorganization process including, but not limited to, mergers, acquisitions, consolidation, change in control, reorganization or liquidation, and sales of all or substantially all of our assets. Please see the “Assignment” Section below for more details; and
- With law enforcement, government agencies, and other third parties, for complying with the law, enforcing our website policies, or protecting our or others’ rights, property, or safety.

We may choose to share aggregate and non-personal information with third parties for any reason.

Collection and Use of Information from Children Under the Age of 13

The Sites are not intended for use by persons under the age of 13. If you are under the age of 13, you are now allowed to use the Sites or submit any personal information to us. If you are 13 or older but younger than 18, you are only allowed to use the Sites with the approval and involvement of a parent or legal guardian. If you do not meet these age requirements, you are not allowed to use the Sites. Bright does not knowingly collect information from visitors under the age of 13 and, in the event that we learn that a person under the age of 13 has provided Bright with personal information, we will delete such personal information.

Blogs, Forums, Chat Rooms, and Other Public Posting Areas

Please note that any information you include in a message you post to any blog, forum, chat room, or other public posting area is available to anyone with Internet access. If you don't want people to know your email address, for example, don't include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN BLOGS, CHAT ROOMS,

FORUMS, AND OTHER PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN BLOGS, CHAT ROOMS, FORUMS, AND OTHER PUBLIC POSTING AREAS.

Security of Your Information

We implement security measures we believe are reasonable to protect your information. It is important that you protect and maintain the security of your account credentials and you need to immediately notify us of any unauthorized use of your account. We may use third-party products and services to secure or store your information. You need to know, however, that due to the open communication nature of the Internet we cannot guarantee that communication between you and us, and between us and you, will be free from unauthorized access by third parties nor can we be responsible for information stolen from our servers or computer systems by information harvesting software which may have the ability to scrape data. Please understand that no data transmission over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us. Understand that any information that you transfer to us is done at your own risk. If we learn of a data security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Sites or providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Sites. We may post a notice via the Sites if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive written notice of a data privacy or security breach. If you have reason to believe that your personal information that we have collected or our system security has been breached, please notify us by emailing support@brightmls.com.

Accessing and Controlling Your Information

If you have an account on our Sites you can access and edit the information you provided to us through individual settings in the Sites. If you want to delete your account and information on our Sites, please contact us directly by emailing your request for account termination to support@brightmls.com.

Opting Out of Marketing Communications

You may also opt-out of commercial communications by contacting us by email at support@brightmls.com or clicking the “unsubscribe” link in one of our marketing emails. We will process your requests as soon as possible, but please be aware that it may take us some time to respond to your request and, in some circumstances regarding opt-out requests, you may receive a few more messages until your request is processed.

Third-Party Websites

Our Sites may link to third-party websites from companies other than Bright, such as to relevant online resources, our partners’ websites, and other third-party websites. We are not responsible for the privacy practices or content of such other websites. If you have any questions about how these other websites

use your information, you should review their policies and contact them directly. We are not responsible for the actions of third parties.

Assignment

In the event that all or part of our assets are sold or acquired by another party, or in the event of a direct or indirect reorganization process including but not limited to mergers, acquisitions, divestitures, and bankruptcies, you grant us the right to assign your personal information collected via the Sites following completion of such transaction and/or during the assessment process pending transfer. If transferred in such a case, the purchaser will abide by the terms and conditions of this Privacy Statement.

Accessing Our Sites From Outside Of The United States

If you are visiting our Sites from a location outside of the U.S., your connection may be through and to servers located in the U.S. Any information you provide during your visit will be processed and maintained on our server and other internal systems located within the U.S. You acknowledge you understand that by providing your personal information to us, your personal information (i) will be used for the uses identified above in accordance with this Privacy Statement, and (ii) may be transferred to the U.S. as indicated above, in accordance with applicable law.

Your California Privacy Rights

California Civil Code Section 1798.83 permits visitors to the Sites who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us by emailing us at support@brightmls.com and include “Shine the Light Request” in the subject line of your email.

We do not share personal information with third parties for their direct marketing purposes unless you consent to such disclosure, typically by “opting in” to receive information from a third party that is participating in a sweepstakes or other promotion on one of our Sites. If you do ask us to share your personal information with a third party for its marketing purposes, we will only share information in connection with that specific promotion, as we do not share information with any third party (other than our service providers) on a continual basis.

If you are a California resident, you may have the following additional rights regarding your personal information:

- You have the **right to know and right to access information** about the categories and specific pieces of personal information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third parties with whom we share such information. You also have the right to know if we have sold or disclosed your personal information. You may also request a copy of the personal information we have collected, and upon request, we will provide this information to you in electronic form.
- You have the **right to request information** about our sale or disclosure for business purposes of your personal information to third parties.

- You have the **right to request the deletion of your personal information**, subject to certain legal exceptions.
- You have the **right to opt out of the sale of your personal information** to third parties. We do not sell your personal information, including the personal information of children under 16 years of age, at this time.
- You have the **right to not be discriminated against** for exercising any of these rights, including where financial incentives are offered. For reference, we may offer various financial incentives from time to time. The terms of the financial incentive will be provided at the time you sign up for the financial incentive. You may withdraw from any of the financial incentives. We have calculated the value of the financial incentive by using the expense related to the offer, and the value of your data is the value of the offer presented to you. We will not discriminate against you for opting out.

If you would like to exercise one or more of the above rights, please contact us using the contact information provided below. You may also designate an authorized agent to make a request on your behalf. The authorized agent must have appropriate permission to submit requests on your behalf. Whenever feasible for verification, we will match the identifying information provided by you to the personal information already maintained by us. If, however, we cannot verify your identity from the information already maintained by us, we may request additional information.

How We Respond to Do-Not-Track Disclosures

The “Do Not Track” (DNT) privacy preference is an option that may be made in some web browsers allowing you to opt out of tracking by websites and online services. At this time, global standard DNT technology is not yet finalized and not all browsers support DNT. We therefore do not recognize DNT signals and do not respond to them.

Privacy Statement Changes

We reserve the right to change or amend our Privacy Statement to address new issues of privacy and information security and to reflect changes to our Sites or business practices. Any new changes and/or amendments will be posted on this page. Each version of this Privacy Statement may be identified by its effective date which is located at the top of the page. If we make material changes to our Privacy Statement, we will notify you and other users by posting the changes on the Sites or by using the contact information you have on file with us and will indicate when such changes will become effective. By continuing to use our Sites you are agreeing to be bound by any changes or revisions made to this Privacy Statement.

Disputes and Agreement to Arbitrate

By using the Sites, you and Bright agree that, if there is any controversy, claim, action, or dispute arising out of or related to your use of the Sites, or the breach, enforcement, interpretation, or validity of this Privacy Statement or any part of it (“Dispute”), both parties shall first try in good faith to settle such Dispute by providing written notice to the other party describing the facts and circumstances of the Dispute and allowing the receiving party 30 days in which to respond to or settle the Dispute.

Notice shall be sent:

(1) to Bright at:
909 Rose Avenue, Suite 1050
North Bethesda, MD 20852 Attn: Legal Department, or

(2) to you at: the contact information on file with Bright.

Both you and Bright agree that this dispute resolution procedure is a condition precedent that must be satisfied before initiating any litigation or filing any claim against the other party.

IF ANY DISPUTE CANNOT BE RESOLVED BY THE ABOVE DISPUTE RESOLUTION PROCEDURE, YOU AGREE THAT THE SOLE AND EXCLUSIVE JURISDICTION FOR SUCH DISPUTE WILL BE DECIDED BY BINDING ARBITRATION ON AN INDIVIDIAUL BASIS. ARBITRATION ON AN INDIVIDUAL BASIS MEANS THAT YOU WILL NOT HAVE, AND YOU WAIVE, THE RIGHT FOR A JUDGE OR JURY TO DECIDE YOUR CLAIMS, AND THAT YOU MAY NOT PROCEED IN A CLASS, CONSOLIDATED, OR REPRESENTATIVE CAPACITY. Other rights that you and we would have in court will not be available or will be more limited in arbitration, including discovery and appeal rights. All such Disputes shall be exclusively submitted to the American Arbitration Association under its Arbitration Rules, before three arbitrators on an individual basis and not aggregated with the claims of any third party; class action arbitration is prohibited. The arbitrators will conduct hearings, if any, by teleconference or videoconference, rather than by personal appearances, unless the arbitrators determine upon request by you or by us that an in-person hearing is appropriate. Any in-person appearances will be held at a location which is reasonably convenient to both parties with due consideration of their ability to travel and other pertinent circumstances. If the parties are unable to agree on a location, such determination will be made by the arbitrators.

The arbitrator, and not any federal, state, or local court or agency, shall have exclusive authority to resolve any dispute arising under or relating to the interpretation, applicability, enforceability, or formation of this Privacy Statement, including any claim that all or any part of this Privacy Statement is void or voidable.

Contacting Us: Questions About Our Privacy And Information Security Practices

Your visit to this Site is subject to both this Privacy Statement and our Terms of Use. If you have any questions, comments, or concerns regarding our Privacy Statement or practices, please send an email to legalaffairs@brightmls.com, call 301-838-4656 or write to us at the following address:

909 Rose Avenue, Suite 1050
North Bethesda, MD 20852
Attn: Legal Department

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