

Zeme Inc. Privacy Policy

Updated October 4, 2023

When you use Zeme Inc., (“Zeme”) services, rest assured you are trusting us with your data. This Privacy Policy (“Policy”) describes the different types of personal data we collect, why we use it, who we share it with, and how we protect it. This Policy is not a contract and does not create any legal rights or obligations.

We carefully evaluate and reevaluate how we use data to ensure that we’re using your information to provide value for you. We aim to explain everything you need to know about your privacy at Zeme. If you have any questions that we haven’t answered here, you can always contact us at privacy@zeme.io

When we use the terms “Zeme”, “we”, “us”, or “our” in this Policy, we are referring to Zeme Inc..

Our Offerings: When we use the terms “offerings” or “services,” we are referring to our websites, mobile applications, and other services that link to this Policy.

This Policy does not cover or address:

1. Disclosures or rights we may provide to you in relation to the United States Fair Credit Reporting Act (FCRA) or;
2. Disclosures or rights we may provide to you in relation to U.S. state-specific financial privacy laws;
3. Offerings that we provide solely on behalf of our business partners;
4. The terms and provisions set forth in our Terms of Service;
5. Personal data and privacy practices relating to job applicants, employees and other Zeme personnel.

For offerings provided on behalf of our customers who are real estate professionals (such as brokers, agents, landlords, and property managers), please refer to the Policy of the real estate professional for information on how they engage us to process your personal data.

What is Personal Data?

When we use the term “personal data” in this Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual or household. This includes but is not limited to names, addresses, social security numbers, ITINs, EINs, emails, phone numbers and usernames. It does not include aggregated or anonymized information that is maintained in a form that is not capable of being associated with or reasonably linked to an individual.

Our Collection and Use of Personal Data

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The personal data we collect, the way we collect it, and how we use it will depend on how you are interacting with us and the type of services you use. Zeme is dedicated to providing the utmost security while maintaining the integrity of our services.

Information We Collect As You Use Our Services

Collection of Personal Data

As is true of most digital platforms, we and our third-party providers collect certain personal data automatically when you visit or interact with our websites, mobile apps, and other online services. This includes things like your search history, views, activity, what you've clicked on, other uses of our websites, and the amount of time you spend looking at different parts of our websites.

We, along with our third-party partners, utilize tracking technologies to automatically gather information related to preferences, internet, network, and device details, which include, but are not limited to:

- **Information about how you access our services**, such as the website from which you came and the website to which you are going when you leave our websites, how frequently you access the services, when and whether you open emails or click the links contained in emails, whether you access the services from multiple devices and other actions you take on the services.
- **Information about how you use the services**, such as the pages you visit, the links you click, the ads you view and click on, purchase information and your checkout process, your location when you access or interact with our services, and other similar actions.
- **Information about the computer, tablet, smartphone or other device you use**, such as your IP address, browser type, Internet service provider, platform type, device type/model/manufacture, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser, mobile device, or your account (including, e.g., a persistent device identifier or an Ad ID), and other such information (referred to herein as "Log Data").
- **Analytics Data**, such as information about your activity when you visit our sites or use our apps; this can include clicks, mouse movements, forms you fill out, and similar information. We use this to better understand what features and parts of the website are most useful, and which ones may need to be improved.
- **Cookies, pixels, and other tracking**: We and our partners use various tools to collect data when you visit our sites and apps, including cookies, pixel tags, and other similar technologies. Cookies are bits of electronic data that can be transferred to your computer or other device to identify your browser. When you use Zeme, we and our partners may use cookies and other tools to gather information about how you view and use our services and content, and to connect your activity with other data we store about you. The use of cookies helps us serve you better by understanding what you're

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interested in, tracking trends, measuring the effectiveness of ads, saving your preferences, and storing information you may want to retrieve on a regular basis, such as your saves. We also allow approved partners to collect data from your browser or device for advertising and measurement purposes using their own cookies or similar tools; these are categorized as “Advertising Cookies”.

This information allows us to improve your customer experience. For example, we may use this information to enhance and personalize your user experience, to monitor and improve our websites and services, and for other internal purposes. We may also use this 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 platform; (b) provide custom, personalized content, and information; (c) identify and contact you across multiple devices; (d) provide and monitor the effectiveness of our services; (e) perform analytics and detect usage patterns on our services; (f) diagnose or fix technology problems; (g) detect or prevent fraud or other harmful activities; and (h) enhance our services.

Information You Give Us or Create Using Our Services

Collection of Personal Data

When you use our services, websites, or apps, we collect personal data from you. We might also collect personal data about you from our business partners, payment processors, service providers, and other third parties who collect personal data on our behalf. This information might include and is not limited to:

- **Account Registration and Profile Information:** If you register for an account through our services or complete a Zeme profile, we collect account identifiers (including a username and password, as well as internal identifiers we assign to individual accounts to allow our systems to connect account information stored in different databases) and account history and records (including services you’ve used or interacted with, the date and type of account creation, account status, log in activity, transactions, the services we provide, messages received in connection with the services, and your activity on our websites and mobile applications). We use this information to create and administer your account, provide you with the relevant services and information, communicate with you regarding your account and your use of the services, for customer support purposes, and to send you communications by email, push notification, or by text message, in accordance with your preferences.
- **Customer Service and Communication History:** Including name, address, email, customer service requests, Account Identifiers, Account History and the contents of requests and correspondence with us (including recordings of phone calls, where permitted by law).
- **Feedback Information:** If you submit a review, feedback or other comments, we collect your contact information (such as first and last name, email address, and phone number) and any feedback and ratings relating to our services and products, including reviews you create of real estate professionals.

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- **Inquiries and Communication:** If you communicate with us or otherwise submit an inquiry or question (e.g., via webform), we collect your contact information (such as first and last name, email address, and phone number), account identifiers and history (described above), and any other personal data you choose to provide in the content of your message or communication. We use this information to investigate and respond to your inquiries, to facilitate communication with us, to provide you with requested information, to enhance the services we offer, and to manage and grow our business. If you represent a company or agency interested in partnering with us, we will also collect your professional and employment information in order to respond to your inquiries, communicate with you, to manage and grow our organization and to facilitate a business relationship. Our websites and online services provide you the ability to connect with us through an online web form that collects contact information (such as, but not limited to, first and last name, email address, phone number, company name, and title with company), area(s) of interest or concern, and a custom message.
- **Location Data:** Including general geographic location reflected in the Log Data we collect or a more precise location when you choose to share it with us through your device or browser settings.
- **Newsletters and Email Communication:** Many of our websites and online services provide you an opportunity to sign up for our newsletters and email communications by providing your email address. We use your email address to communicate with you about our services and exciting developments at Zeme, which may include marketing communications.
- **Payment Information:** We and our third-party service providers collect information relating to your transactions with us, including details regarding payments you've made through our sites or apps. We use third-party payment tools to process and store payment information like credit card numbers or bank account information. We don't store this information ourselves.

Although we often collect the personal data described above directly from you, we may also collect certain information through our business partners, service providers, and other third parties that collect it on our behalf, such as communications providers, data brokers, payment processors, payment system providers, and information technology providers.

Please note that we link the personal data we collect in connection with our services with the other personal data that we collect and may use it for the purposes we describe in more detail in the other sections of this Policy.

Other Collection of Personal Data

In addition to the personal data collected above, we may also collect personal data as follows:

- **Business Partners:** Our business partners collect personal data in connection with their services and often share some or all of this information with us. For example, we receive

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information about transactions you complete with partners with whom we've connected you through our services.

- **Business Representatives:** We collect professional personal data about representatives of third-party businesses, including representatives of our customers and business partners, in connection with our services and the operation of our business, which may include:
 - *Contact Information:* Including full name, email address, mailing address, and telephone number.
 - *Professional Information:* Including job title, job function, company name and characteristics, professional background, and nature of the relationship with us.
 - *Tax and Payment Information:* Including a personal tax identification number, bank account information, and payment information where you are a representative of a sole proprietor or similar legal structure that uses personal tax and account information in lieu of separate business information.
 - *Inquiry Information:* Including the contents of emails, texts, and other communications and, where permitted by law, recordings of calls with us.
 - *Feedback Information:* Including information provided in response to surveys we may conduct with customers or business partners, or unsolicited feedback received regarding our services and business.
- **Office and Event Visitors:** We collect personal data about visitors to our physical offices and events, which may include:
 - *Contact Information:* Including full name, email address, mailing address, and telephone number.
 - *Professional Information:* Including job title, job function, company name, professional background, and nature of the relationship with us.
 - *Visit Information:* Including the purpose of the visit and any restrictions or preferences while on premise (such as dietary restrictions).
 - *Security Information:* Including a copy of a government ID (such as a driver's license) and a record of the visitor's access to our office or event, any use by the visitor of our computer systems, and images or video recordings of the visitor while on premises (where permitted by law).
- **Service Providers:** Our service providers, such as payment processors and marketing providers, collect personal data and often share some or all of this information with us. For example, we receive personal data from payment processors to confirm that an individual's payment for the services was accepted. We use this information to comply with our legal obligations, to monitor activity to identify and provide you with promotions and offers, and to prevent fraud, protect our rights and the rights of others, to inform our marketing and advertising activities, and to help provide our services.
- **Information Providers:** We may from time to time obtain information from third-party information providers to correct or supplement personal data we collect. For example, we may obtain updated contact information from third-party information providers to reconnect with you.
- **Publicly Available Information:** We may collect personal data from publicly available sources, such as information you publicly post or tag us in on social media sites or

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elsewhere online, and information contained in public records databases, such as government records or public review websites, to supplement the personal data identified above. We will use this information to conduct market research, verify your identity, prevent fraud, and improve our services.

Other Uses of Personal Data

In addition to the uses identified above, we use the personal data we collect to:

- Facilitate our day-to-day business operations, such as helping you find your next home, or connect with a real estate agent, lender, landlord, or other real estate professional;
- Create and maintain the services, develop new products and services, and improve existing products and services;
- Aggregate information we receive from you and third parties to help understand individual needs, customize our services and offerings, and provide everyone better service;
- Conduct research and analytics designed to understand our customer base and improve and grow our business, products, services, and customer experience;
- Communicate with you to provide technical or administrative support;
- Prevent, investigate, and defend against fraud or unlawful or criminal activity, access to, or use of personal data and our data system services;
- Enforce, investigate, and resolve disputes and security issues and to enforce our Terms of Service and any other contracts;
- Comply with legal obligations and other governmental demands;
- Understand your preferences and interests to better serve you on your home-finding journey;
- Personalize your individual experience, including providing educational resources and pointing you to homes you might be interested in or offerings of ours that might help you find your next home; and
- For any other lawful, legitimate business purpose.

Our Disclosure of Personal Data

We may disclose your personal data in the instances described below.

We disclose your personal data in the following ways:

- **Business Partners:** We may share your personal data with our business partners in order to provide you with our products and services.
- **Marketing Partners:** We coordinate and share your personal data with our marketing partners, including advertising networks, social networks, and marketing communication providers, in order to communicate with you about our products and services and market our products and services to you. We may also share aggregated demographic information with third parties interested in advertising on our online services to assist

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them in understanding the audience they would be reaching, but this information is not designed to identify any specific individual.

- **Service Providers:** We share information with third party vendors and service providers that perform services for or on our behalf, which may include identifying and serving targeted advertisements, providing mailing or email services, tax and accounting services, customer service, product fulfillment, payments processing, photo sharing, data processing and enhancement services, fraud prevention, web hosting, analytic services, or other online functionality, subject to appropriate contractual terms protecting the confidentiality and use of such data.
- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose your personal data to a third party during negotiation of, in connection with, or as an asset in such a corporate business transaction. Your personal data may also be disclosed in the event of insolvency, bankruptcy, or receivership.
- **Legal Obligations and Rights:** We may disclose your personal data to third parties, such as legal advisors and law enforcement:
 - In connection with the establishment, exercise, or defense of legal claims;
 - To comply with laws and regulations or to respond to lawful requests and legal process;
 - To protect our rights and property and the rights and property of our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
 - To detect, suppress, investigate or prevent fraud;
 - To reduce credit risk and collect debts owed to us;
 - To protect the health and safety of us, our customers, or any person; or
 - As otherwise required by applicable law.
- **Otherwise with Consent or At Your Direction:** We may disclose your personal data to certain other third parties or publicly with your consent or direction. If you post a comment or review our website or a comment on our social media sites, the information you provide may be displayed publicly online for others to view.

Choices About Your Data

Profile Access. You may access and update your profile information, such as your username, address, or billing information.

Location and Device Permissions. You may control location tracking by adjusting your location services options on the “Settings” app on your mobile device. We may continue to approximate your location based on your IP address when you access the services through a computer or device. If you would like to update your device content access permissions, such as permissions to access your camera, you can do so in the “Settings” app on your mobile device.

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Promotional Messages. You can stop receiving promotional email communications from us by following the “unsubscribe” instructions provided in such communications. We make every effort to promptly process all unsubscribe requests. You may still receive service-related communications, including account verification, transactional communications, changes/updates to features of the services, and technical and security notices.

Third-Party Tracking and Interest-Based Advertising. We may participate in interest-based advertising and use third party advertising companies to serve you targeted advertisements based on your browsing history. We may permit third party online advertising networks, social media companies, and other third-party services to collect information about your use of our websites, including our mobile apps, over time so that they may play or display ads on our services, on other websites, apps, or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through tracking technologies, such as cookies, flash objects, web beacons, embedded scripts, mobile SDKs, location-identifying technologies, and similar technology (collectively, “tracking technologies”), which recognize the device you are using and collect information, including clickstream information, browser type, time and date you visited the site, device ID or AdID, geolocation, and other information. We may share a common account identifier (such as an e-mail address or user ID) or hashed data with our third-party advertising partners to help identify you across devices. We and our third-party partners may use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

We, or our third-party partners, may link your various devices so that content you see on one device can result in relevant advertising on another device. We may share a common account identifier (such as a hashed email address or user ID) or work with third-party partners who use tracking technologies or statistical modeling tools to determine if two or more devices are linked to a single user or household. We, and our partners, can use this cross-device linkage to serve interest-based advertising and other personalized content to you across your devices (including to improve your user experience), to perform analytics, and to measure the performance of our advertising campaigns.

Your Choices

As noted above, depending on your browser or mobile device, you may be able to set your browser to delete or notify you of cookies and other tracking technology by actively managing the settings on your browser or mobile device. You may be able to limit interest-based advertising through the settings on your mobile device by selecting “limit ad tracking” (iOS) or “opt-out of interest based ads” (Android). Please note that opt-outs are browser specific, so opting out on one browser will not affect a second browser, or device. Moreover, if you buy a new device, use a different browser, or clear all your cookies, you will have to opt out all over again. To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Network Advertising Initiative’s online resources, at <http://www.networkadvertising.org/choices>, and/or the DAA’s resources at

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www.aboutads.info/choices. You may also be able to opt-out of some – but not all – interest-based ads served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app. Note that some of these opt-outs may not be effective unless your browser is set to accept cookies. If you delete cookies, change your browser settings, switch browsers or computers, or use another operating system, you may need to opt-out again.

Minor's Personal Data

Our websites and online services are not directed to, and we do not intend to or knowingly collect or solicit personal data from minors under the age of 18. If you are under the age of 18, please do not use our websites or online services or otherwise provide us with any personal data either directly or by other means. If a minor under the age of 18 has provided personal data to us, we encourage the minor's parent or guardian to contact us as described below to request that we remove the personal data from our systems. If we learn that any personal data we collect has been provided by a minor under the age of 18, we will promptly delete that personal data.

Third-Party Websites

Our websites and online services may include links to or redirect you to third-party websites, plug-ins and applications, including social media services where you may connect with us. Third-party websites may also reference or link to our websites and online services. Except where we post, link to, or expressly adopt or refer to this Policy, this Policy does not apply to, and we are not responsible for, any personal data practices of third-party websites and online services or the practices of other third parties. To learn about the personal data practices of these third parties, please visit their respective policy or policies.

Updates to this Policy

We will update this Policy from time to time. When we make changes to this Policy, we will change the "Last Updated" date at the beginning of this Policy. If we make material changes to this Policy, we will notify you. All changes shall be effective from the date of publication unless otherwise provided in the notification.

Contact Us

If you have any questions or requests in connection with this Policy or other privacy-related matters, please send an email to privacy@zeme.io. Alternatively, inquiries may be addressed to: Zeme Inc. 240 W 40th Street, 2nd Floor, New York, NY 10018 Attention: Privacy

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Additional U.S. State Privacy Disclosures

These Additional U.S. State Privacy Disclosures supplement the above information by providing additional information about our personal data processing practices relating to individual residents of the States of California, Colorado, Connecticut, Utah, and Virginia. Unless otherwise expressly stated, all terms defined in our Policy retain the same meaning in these Disclosures.

Additional Personal Data Disclosures

Sensitive Information

The following personal data elements we collect may be classified as “sensitive” under certain privacy laws (“sensitive information”):

- Social Security number, driver’s license number, and passport number;
- Credit/debit card number plus expiration date and security code (CVV), and financial account number and routing number;
- Username and password; and
- Precise geolocation data.

We use this sensitive information for the purposes set forth in the “Our Collection and Use of Personal Data” section of our Policy, to provide you full use of our services, to comply with legal and regulatory requirements, to protect the life or physical safety of you or others, or as otherwise permissible for our internal business purposes consistent with applicable laws.

We do not sell your sensitive information, and we do not process or otherwise share sensitive information for the purpose of targeted advertising.

Anonymized Information

We may at times receive or process personal data to create anonymized data that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual or household. Where we maintain anonymized data, we will maintain and use the data in anonymized form and not attempt to re-identify the data except as required or permitted by law.

Your Privacy Choices

Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

1) The Right to Know

- The right to confirm whether we are processing your personal data and, under some state laws, to obtain certain personalized details about the personal data we have collected about you, including:

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- The categories of personal data collected;
- The categories of sources of the personal data;
- The purposes for which the personal data were collected;
- The categories of personal data disclosed to third parties (if any), and the categories of recipients to whom the personal data were disclosed;
- The categories of personal data shared for cross-context behavioral advertising purposes (if any), and the categories of recipients to whom the personal data were disclosed for those purposes; and
- The categories of personal data sold (if any), and the categories of third parties to whom the personal data were sold data and, under some state laws, to obtain certain personalized details about the personal data we have collected about you, including: The categories of personal data collected; The categories of sources of the personal data; The purposes for which the personal data were collected; The categories of personal data disclosed to third parties (if any), and the categories of recipients to whom the personal data were disclosed; The categories of personal data shared for cross-context behavioral advertising purposes (if any), and the categories of recipients to whom the personal data were disclosed for those purposes; and The categories of personal data sold (if any), and the categories of third parties to whom the personal data were sold.

2) The Right to Access & Portability

- The right to obtain access to the personal data we have collected about you and, where required by law, the right to obtain a copy of the personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.

3) The Right to Correction

- The right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data.

4) The Right to Deletion

- The right to have us delete the personal data we maintain about you.

5) The Right to Opt-Out of Sales or Sharing of Personal Data

- The right to direct us not to “sell” your personal data to third parties for monetary or other valuable consideration, or “share” your personal data to third parties for cross-context behavioral advertising purposes and targeted advertising purposes.

6) “Shine the Light”

- California residents that have an established business relationship with us have rights to know how their personal data is disclosed to third parties for their direct marketing purposes under California’s “Shine the Light” law, or the right to opt out of such practices (Civ. Code §1798.83).

Depending on your state of residence, you may also have the right to not receive retaliatory or discriminatory treatment in connection with a request to exercise the above rights. However, the exercise of the rights described above may result in a different price, rate, or quality level of

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product or service where that difference is reasonably related to the impact the right has on our relationship or is otherwise permitted by law.

Submitting Privacy Rights Requests

To submit a request to exercise one of the privacy rights identified above, please:

- Email us at privacy@zeme.io

We may need to verify your identity before processing your request. In order to submit a request, you'll need to log in to your account with us so we can verify your identity. If you can't log in or don't have an account, we may not be able to link you to any personal data of yours on our systems, but we'll do our best. In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to verify your identity or locate your information in our systems. We will use personal data provided in connection with a Rights Request only to review and comply with the request.

To Exercise Your Right to Opt-Out of Personal Data Sales or Sharing for Targeted Advertising

Unless you have exercised your Right to Opt-Out, we may disclose your personal data to third parties who may use such information for their own purposes in accordance with their own privacy policies. Under some state laws, disclosing personal data for online advertising like this may be considered a "sale of personal data" or "sharing for targeted advertising."

Zeme allows certain companies to place tracking technologies like cookies and pixels on our sites, which allow those companies to receive information about your activity on Zeme that is associated with your browser or device. The companies may use that data to serve you more relevant ads on our sites or others. Except for this kind of selling or sharing, Zeme doesn't otherwise sell any of your personal data. You always have control over whether these technologies work on your devices. At any time, you can use our cookie preference tools to manage what kinds of cookies and other tracking technologies you're comfortable with. You can also disable cookies altogether by adjusting the settings on your browser. However, if you choose to disable some or all cookies, many parts of our services may no longer work. For more information, see the "Third-Party Tracking and Interest-Based Advertising" section in the Policy.

You do not need to create an account with us to exercise your Right to Opt-Out. However, we may ask you to provide additional personal data so that we can properly identify you to track compliance with your opt-out request. We will only use personal data provided in an opt-out request to review and comply with the request. If you choose not to provide this data, we may be able to process your request only to the extent we are able to identify you in our data systems.

To exercise the Right to Opt Out of Personal Information Sales or Sharing: email privacy@zeme.io with sufficient information to identify you and your request.

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Submitting Authorized Agent Requests

In certain circumstances, you are permitted by law to use an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent's authority to act on your behalf. In order to verify the authorized agent's authority, we generally require evidence of either: (i) a valid power of attorney; or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the evidence provided and your state of residence, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

Appealing Privacy Rights Decisions

Depending on your state of residence, you may be able to appeal a decision we have made in connection with your privacy rights request. All appeal requests should be submitted via email to privacy@zeme.io