

# PRIVACY POLICY

Last modified: October 22, 2024

## Introduction

NewHomeListingService.com, doing business through Constellation Homebuilder Systems Inc., if You are located in the United States of America, and Constellation Homebuilder Systems, a division of Perseus Group Software Corp., if You are located in Canada, ("**Company**," "**Us**," "**Our**," or "**We**") respect Your privacy and are committed to protecting it through Our compliance with this Privacy Policy. Please read this Privacy Policy carefully to understand Our policies and practices regarding the Personal Information We collect from You, how We use it, how We share it, Your rights and choices with respect to Your Personal Information, and how You can contact Us about Our privacy practices.

This Privacy Policy applies to Personal Information We collect about You from various sources, as further described in the "*Personal Information We Collect and How We Collect It*" section below. For individuals using other Constellation Homebuilder Systems products, please refer to the Constellation Homebuilder Systems Privacy Policy at <https://www.constellationhb.com/privacy/>.

## Definitions

"**Affiliate**" means any entity that now or hereafter (i) directly or indirectly owns or controls, is owned or controlled by, or is under common ownership or control with a Us, and (ii) is under common management with Us.

"**Builder**" means a homebuilder whose homes are listed on the Website.

"**Homebuyer Service Provider(s)**" means real estate agents and other professionals with whom You can connect with using the Website.

"**Personal Information**" means any information that identifies or relates to an individual or can be used in conjunction with other information to identify an individual, whether such information is explicitly regulated by applicable law or otherwise.

"**Processing**" means any operation or set of operations which is performed on Personal Information, encompassing the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction or erasure of Personal Information. The terms "Process", "Processes" and "Processed" will be construed accordingly.

"**User**" means a Visitor that submits their Personal Information in a request for information from a Builder or Homebuyer Service Provider, whether by entering their information into a web form on the Website or otherwise.

"**Visitor**" means any individual that visits the Website or that otherwise communicates with the Company.

"**Website**" means the <https://newhomelistingservice.com/> website, including any sub-domains.

"**You**" and "**Your**" mean User or Visitor, depending on the context as further explained in this Privacy Policy, and if there is no context which specifically identifies any of the foregoing, then "You" or "Your" means both of the foregoing collectively.

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## **PART A: INFORMATION FOR ALL INDIVIDUALS** (subject to applicable law, where stated)

### **Personal Information We Collect and How We Collect It**

#### *For Visitors and Users*

We collect the following Personal Information about You from the following sources:

<u>Categories and Types of Personal Information We Collect</u>	<u>Sources From Which We Collect Your Personal Information</u>
<b>Identifiers</b> , including real name, postal address, phone number, Internet Protocol address, and email address	<ul style="list-style-type: none"><li>• From You directly when You provide it to Us through communications or otherwise.</li><li>• From Your use of the Website, including collection via cookies and other automated data collection technologies.</li></ul>

<b>Internet or other similar network activity</b> , including browsing history; search history; and information on Your interaction with Our Website	
<b>Geolocation data</b> , including imprecise physical location derived from IP address and/or wifi networks	

## **How We Use and Disclose Your Personal Information**

### *For Visitors and Users*

We *Process* Your Personal Information described below for the following purposes:

<u>Categories and Types of Personal Information</u>	<u>Purpose for Processing</u>
<b>Identifiers</b> , including real name, postal address, phone number, Internet Protocol address, and email address	<ul style="list-style-type: none"> <li>• To answer Your questions, handle complaints, and otherwise communicate with You</li> <li>• To operate the Website</li> <li>• To send You marketing messages or promotional materials from Us.</li> <li>• To debug, troubleshoot, or verify or maintain the quality or safety of the Website</li> <li>• To improve or upgrade the Website</li> <li>• To create an account on the Website</li> <li>• To prevent fraud or misuse of the Website</li> <li>• To provide customer support</li> <li>• <i>For Users only:</i> Pursuant to Your request, We will share Your information with a Builder or Homebuyer Service Provider You wish to connect with, who uses Our products to Process that Personal Information.</li> </ul>
<b>Internet or other similar network activity</b> , including browsing history; search history; and information on Your interaction with Our Website	<ul style="list-style-type: none"> <li>• To operate, improve, or update the Website</li> <li>• To debug, troubleshoot, or verify or maintain the quality or safety of the Website</li> <li>• To prevent fraud or misuse of the Website</li> </ul>
<b>Geolocation data</b> , including imprecise physical location derived from IP address and/or wifi networks	<ul style="list-style-type: none"> <li>• To operate, improve, or update the Website</li> <li>• To debug, troubleshoot, or verify or maintain the quality or safety of the Website</li> <li>• To prevent fraud or misuse of the Website</li> </ul>

We *disclose* Your Personal Information described below to the following categories of third-parties and for the following purposes:

<u>Categories and Types of Personal Information</u>	<u>Categories of Parties to Whom We Disclose the Information</u>	<u>Purpose for Disclosing</u>

<b>Identifiers</b> , including real name, postal address, phone number, Internet Protocol address, and email address	<ul style="list-style-type: none"> <li>• Vendors</li> </ul>	<ul style="list-style-type: none"> <li>• To answer Your questions, handle complaints, and otherwise communicate with You</li> <li>• To debug, troubleshoot, or verify or maintain the quality or safety of the Website</li> <li>• To perform analytics services</li> <li>• To send You marketing messages or promotional materials from Us.</li> <li>• To operate, improve or update the Website</li> <li>• To prevent fraud or misuse of the Website</li> <li>• To provide customer support</li> </ul>
	<ul style="list-style-type: none"> <li>• Builders</li> <li>• Homebuyer Service Providers</li> </ul>	<ul style="list-style-type: none"> <li>• <i>For Users only:</i> Pursuant to Your request, We will share Your information with a Builder or Homebuyer Service Provider You wish to connect with, who may reach out to You directly or through one of its representatives. In the event that the Builder You wish to connect with is unavailable, We will send your information with a real estate agent from your region.</li> </ul>
<b>Internet or other similar network activity</b> , including browsing history; search history; and information on Your interaction with Our Website	<ul style="list-style-type: none"> <li>• Vendors</li> </ul>	<ul style="list-style-type: none"> <li>• To operate, improve, or update the Website</li> <li>• To prevent fraud or misuse of the Website</li> <li>• To debug, troubleshoot, or verify or maintain the quality or safety of the Website</li> </ul>
<b>Geolocation data</b> , including imprecise physical location derived from IP address and/or wifi networks	<ul style="list-style-type: none"> <li>• Vendors</li> </ul>	<ul style="list-style-type: none"> <li>• To operate, improve, or update the Website</li> <li>• To prevent fraud or misuse of the Website</li> <li>• To debug, troubleshoot, or verify or maintain the quality or safety of the Website</li> </ul>

**Aggregated, Deidentified, and Anonymized Data**

We create aggregated, deidentified, or anonymized data derived from Our use of Your Personal Information, and such data can be used by Us as permitted by applicable laws and regulations. We will not attempt to re-identify the data.

**Other Purposes for Processing and Disclosing Your Personal Information**

We may also Process and disclose Your Personal Information:

- To competent public authority, government, regulatory or fiscal agency where it is necessary to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or exercise Our rights under any agreement which governs Your relationship with Us, including Our rights under any such agreements that may be exercised for billing and collection purposes.
- If We believe disclosure is necessary or appropriate to protect Our rights, property, or safety, Our customers, or others. This may include the exchange of information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- Subject to some restrictions under applicable laws, We may transfer, whether for consideration or otherwise, Your Personal Information as an asset that is part of a bankruptcy, merger, or other similar transaction involving all or any portion of Our business. Any such transfer does not affect Your rights under any applicable laws.

No telephone or SMS information will be shared with third parties or Affiliates for their own marketing/promotional purposes. All the above disclosures exclude text messaging originator opt-in data and consent, which will not be shared with any third parties. We will only send SMS/telephone communications when We have the appropriate consent to do so or as otherwise permitted by law.

## **Information We Collect Through Automatic Data Collection Technologies**

As You navigate through and interact with Our Website, We may use automatic data collection technologies to collect certain information about Your equipment, browsing actions, and patterns, including:

- Information about your estimated location as may be determined from the IP Address;
- Information about the device you are using, such as:
  - Internet Protocol (or IP) address or device ID/UDID, protocol and sequence information;
  - Browser language and type; and
  - Hardware model, operating system, application version number, device or browser data;
- Domain name system requests;
- Browsing history, time spent at a domain, time and date of your visit, number of clicks, or location data; and
- HTTP headers, application client and server banners.

The information We collect automatically does, in some cases, include Personal Information, or We may maintain it or associate it with Personal Information We collect in other ways or receive from third parties. These activities help Us improve Our Website and deliver a better and more personalized experience, including by enabling Us to:

- Estimate Our audience size and usage patterns;
- Store information about Your preferences, allowing Us to customize Our Website according to Your individual interests;
- Speed up Your searches; and
- Recognize You when You return to Our Website.

We use “cookies” for this automatic data collection. When You visit Our Website, a “cookie” may be sent to Your computer. A cookie is a small piece of data that is sent to Your Internet browser from a web server and stored on Your computer’s hard drive. When You visit the Website again, the cookie allows the Website to recognize Your computer. Cookies may store user preferences and other information to assist Your navigation between pages efficiently, remember preferences, and improve the user experience. You can choose whether to accept cookies by changing Your Internet browser settings, which may impair or limit some functionality of the Website.

- Cookies can be “persistent” or “session” cookies. Persistent cookies remain on Your personal computer or mobile device when You go offline, while session cookies are deleted as soon as You close Your web browser.
- We use first party cookies, which are cookies that We place on Your device ourselves, and third party cookies, which are cookies that We allow third parties to place on Your device.

In some cases, You may also block the use of non-essential cookies altogether using cookie management technology available to You when you visit the Website. You may also leverage any of the methods identified in the “*Exercising Your Rights*” section below in order to opt-out of certain cookies.

### **Google Cookies and Tracking Technologies**

#### *Google Analytics*

We use Google Analytics to track information about how You interact with Our Website so that We can make improvements. We also use analytics cookies to test pages, features or new functionality of the Website to see how Our users react to them.

In order to collect this information, Google Analytics may set cookies on Your browser or mobile device, or read cookies that are already there. Google Analytics may also receive information about You from apps You have downloaded, that partner with Google. We do not combine the information collected through the use of Google Analytics with Personal Information. Click <https://policies.google.com/technologies/partner-sites> to learn about how to control information used by Google Analytics. Google’s ability to use and share information collected by Google Analytics about Your visits to the Website to another application which partners with Google is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. Please review those and see <https://policies.google.com/privacy> or information about how Google uses the information

provided to Google Analytics and how You can control the information provided to Google. Please also visit <https://tools.google.com/dlpage/gaoptout/> for information about a Google Analytics opt-out browser add-on.

## **Third-Party Use of Cookies and Other Tracking Technologies**

Our Website may contain content from and links to other sites that are operated by third parties that may use cookies. We do not control these third-party sites or cookies and this Privacy Policy does not apply to them. Please consult the terms and conditions and Privacy Policy of the relevant third-party site to find out how that site collects and uses Your information and to establish whether and for what purpose they use those cookies. If You are unclear who the responsible third party is, You can contact Us using any of the methods identified in the “*Exercising Your Rights*” section below.

## **International Data Transfers**

In order to carry out the Processing activities described above, We may make use of subcontractors that act on Our behalf as Processors. These subcontractors will be contractually obligated by Us to Process Your Personal Information only in accordance with Our instructions, only for the purposes described above, and only for the period of time necessary to preform those purposes.

In some cases, these subcontractors may be located outside of the data privacy jurisdiction in which You reside. In the event such international data transfers are necessary, We will take the necessary organizational, technical and contractual measures to ensure the protection of Your Personal Information. In certain situations, We may be required to disclose Personal Information in response to lawful requests from law enforcement and national security authorities of that jurisdiction.

For questions or comments about our practices with respect to international data transfers, please refer to the “*Contact Information*” section at the end of this Privacy Policy.

## **Consequences of Not Providing Your Personal Information**

You have the right to withhold Your consent for Us to Process Your Personal Information. Personal Information gathered by Us for the purposes defined in this Privacy Policy may be required by Us, either directly or indirectly, in order for Us maintain a relationship with You; therefore, Your failure to provide Us with Your Personal Information may negatively affect Our ability to:

- Provide the Website to You and fulfill Our contractual obligations with You;
- Fulfill legal requirements;
- Enter into a contract with related parties and continuing to contract with those related parties; or
- Maintain contact with You.

## **Data Security and Storage**

We have implemented technical, administrative, and physical security measures that are designed to protect Your Personal Information from unauthorized access, disclosure, use, and modification. Such measures include the encryption of sensitive information. We regularly review Our security procedures to consider appropriate new technology and methods. Even so, please be aware that no security measure is perfect. Thus, We cannot guarantee the security of Your Personal information at all times. You should always be vigilant when it comes to the protection of Your Personal Information.

## **Retention Period**

Subject to any opt-out rights You may have and all applicable laws, We retain Your Personal Information for only as long as reasonably necessary to carry out the purposes for which We originally collected it, as set forth in this Privacy Policy. Notwithstanding the foregoing, we may continue to retain Your Personal Information to comply with our legal and regulatory obligations; to enable fraud monitoring, detection and loss prevention activities; to comply with our tax, accounting, and financial reporting obligations; and where required by our contractual commitments to third parties.

## **Children Under the Age of 16**

Our Website is not intended for children under 16 years of age. You may not knowingly or unknowingly provide Us Personal Information of minors under 16 years of age through Your use of the Website. We do not knowingly collect Personal Information from children under 16. We do not sell or share Personal Information of children under age 16. No one under age 16 may provide any Personal Information to Us. If You are under 16, do not use or provide any Personal Information on Our Website. If We learn We have collected or received Personal Information from a child under 16 without verification of parental consent, We will delete that information. If You believe We might have any information from or about a child under 16, please contact Us using the Contact Information provided at the end of this Privacy Policy.

## **Your Privacy Rights**

Depending on Your location and subject to applicable law and certain other limitations, You may have the rights set forth below with respect to Your Personal Information. To exercise any of the following rights, please refer to the “*Exercising Your Rights*” section at the end of this Privacy Policy.

**Right to Know/Access and Data Portability.** You have a right to request additional information about the categories of Personal Information collected, sold, disclosed, or shared; purposes for which this Personal Information was collected, sold, disclosed, or shared; categories of sources of Personal Information; and categories of third parties with whom We disclosed or shared this Personal Information. You have a right to receive this information in a portable and, to the extent technically feasible, in a readily useable format that allows You to transmit this information to another entity without hindrance.

**Right to Opt-Out of Our Sale of Your Personal Information.** To the extent that the “*Sale of Personal Information*” section below indicates that We sell Your Personal Information, You have a right to opt-out of those sales. As stated above, to exercise this right to opt-out, please refer to the “*Exercising Your Rights*” section at the end of this Privacy Policy.

**Right to Opt-Out of Our Sharing or Use of Your Personal Information for Targeted Advertising or Cross-Context Behavioral Advertising.** To the extent that the “*Targeted Advertising / Cross-Context Behavioral Advertising*” section below indicates that share or use Your Personal Information for either of those activities, You have a right to opt-out of those activities. As stated above, to exercise this right to opt-out, please refer to the “*Exercising Your Rights*” section at the end of this Privacy Policy.

**Right to Withdraw Consent.** You have the right to withdraw Your consent to Our use of Your Personal Information for the purposes identified in the “*How We Use and Disclose Your Personal Information*” section above.

**Right to Withdraw Consent to Use Sensitive Personal Information.** To the extent that the “*Personal Information We Collect and How We Collect It*” section above indicates that We use Your Sensitive Personal Information, You have a right to withdraw Your consent to allow Us to use that Sensitive Personal Information. As stated above, to exercise this right to opt-out, please refer to the “*Exercising Your Rights*” section at the end of this Privacy Policy.

**Right to Deletion.** You have the right to request the deletion of Your Personal Information, subject to certain limitations.

**Right to Correct/Rectification.** You have the right to request the correction of any inaccuracies in the Personal Information We hold about You, subject to certain limitations.

**Right to Non-Discrimination.** We will not discriminate against You for exercising any of Your rights identified in this section of the Privacy Policy. For example, charge You a different price, or provide a different level or quality of goods or services just because You exercised Your rights under this section of the Privacy Policy; however, We may offer You financial incentives that can result in different prices, rates, or quality levels, provided that (i) You provide Your revocable, opt-in consent to participate in such financial incentive programs, (ii) the financial incentives reasonably relate to the value of Your Personal Information, and (iii) We provide written terms that describe the program's material aspects. Furthermore, there may be situations where Your Personal Information is required by Us, either directly or indirectly, in order for Us maintain a relationship with You. Please refer to the “*Consequences of Not Providing Your Personal Information*” section of this Privacy Policy for more information.

**Right to Request Additional Information on Automated Decision-Making.** Your Personal Information may be used in automated decision-making practices for the processing purposes identified in the “*How We Use and Disclose Your Personal Information*” section above. For additional information on Our automated decision-making practices, please contact Us using the contact information at the end of this Privacy Policy.

**Right to Appeal.** You have the right to appeal any decision made by a Us regarding Your privacy rights identified in this section. To submit an appeal, you may contact Us using the information contained in the “*Contact Information*” section below.

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## **PART B: ADDITIONAL INFORMATION FOR RESIDENTS OF PARTICULAR JURISDICTIONS**

### **Information for Residents of All “US Privacy Law States” (as hereinafter defined)**

If You are a resident of **California, Colorado, Connecticut, Montana, Oregon, Texas, Utah, and Virginia** (each a “**US Privacy Law State**”), We Process Your Personal Information in accordance with the state privacy law that is applicable in Your US Privacy Law State, which is one of the following:

- In **California**: the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (the “CCPA”);
- In **Colorado**: the Colorado Privacy Act (the “CoPA”);
- In **Connecticut**: the Connecticut Personal Data Privacy and Online Monitoring Act (the “CPDP”);
- In **Montana**: the Montana Consumer Data Privacy Act (the “MCDPA”);
- In **Oregon**: the Oregon Consumer Privacy Act (the “OCPA”);
- In **Texas**: the Texas Data Privacy and Security Act (the “TDPSA”);
- In **Utah**: the Utah Consumer Privacy Act (the “UCPA”); and
- In **Virginia**: the Virginia Consumer Data Protection Act (the “VCDPA”).

If You are a resident of any one of the US Privacy Law States, then this “*Information for Residents of All US Privacy Law States*” section discloses Our privacy practices and Your rights as a resident of any one of those US Privacy Law States. The disclosures in this section are in addition to those disclosures set forth in (i) Part A of this Privacy Policy, and (ii) for California residents, the “*Supplemental Information for California Residents*” section of this Privacy Policy below. To the extent that anything in Part B of this Privacy Policy conflicts with anything in Part A of this Privacy Policy, the conflicting content in Part B shall take precedence.

### Sale of Personal Information

We do not sell Your Personal Information.

A transfer, whether for consideration or otherwise, of Your Personal Information as an asset that is part of a bankruptcy, merger, or other similar transaction involving all or any portion of Our business is *not* a “sale” under the laws of US Privacy Law States.

### Targeted Advertising / Cross-Context Behavioral Advertising

Generally speaking, “targeted advertising” and “cross-context behavioral advertising” are defined under the applicable laws of US Privacy Law States as the display of an advertisement to You based on Personal Information about You obtained or inferred over time from Your activities across nonaffiliate websites, applications, or online applications.

We do not share Your Personal Information with third parties for targeted advertising or cross-context behavioral advertising. Additionally, We do not Process Personal Information for Our own targeted advertising or cross-context behavioral advertising purposes.

## Supplemental Information for Residents of California

This “*Supplemental Information for California Residents*” section applies to natural persons who are California residents. If You are a consumer located in California, We Process Your Personal Information in accordance with the CCPA. The disclosures in this section are in addition to those in (i) Part A of this Privacy Policy and (ii) the “*Information for Residents of All US Privacy Law States*” section of Part B of this Privacy Policy. To the extent that anything in the preceding items (i) or (ii) conflicts with anything in this “*Supplemental Information for California Residents*” section, the conflicting content in this section shall take precedence.

### Notice at Collection

**Categories of Personal Information We Collect.** The categories of Personal Information We may collect and have collected about You in the preceding 12 months are: Identifiers, Internet or other similar network activity, and Geolocation data. Additional information about each category, along with the sources from which We collected that Personal Information, is contained in the “*Personal Information We Collect and How We Collect It*” section of this Privacy Policy.

**Business Purposes for Collection and Use of Personal Information.** The business purposes for which We collect Your Personal Information include: operating and improving Our Website, putting you in contact with Builders or Hombuyer Service Providers upon Your request, providing customer support, sending You marketing and promotional material, and ensuring security and compliance. Further detail about Our business purposes for collecting Your Personal Information, information on why We disclose Your Personal Information, along with the categories of third parties to whom We disclose that Personal Information, is contained in the “*How We Use and Disclose Your Personal Information*” section of this Privacy Policy

**Commercial Purposes for Collection and Use of Personal Information (Sale and Sharing).** We neither sell Your Personal Information nor share it with third parties for cross-context behavioral advertising.

**Retention Period of Personal Information.** We retain Your Personal Information as set forth in the “*Retention Period*” section of this Privacy Policy.

### Sensitive Personal Information

We do not Process Your “sensitive” Personal Information, as that term is defined by the CCPA.

### California Shine the Light Law

You may ask Us to provide You with a list of the types of Personal Information that We have disclosed during the preceding year to third parties for their direct marketing purposes, and the identity of those third parties. If You are a California resident and would like such a list, please refer to the “*Exercising Your Rights*” section at the end of this Privacy Policy.

### Notice of Financial Incentives

We do not offer any financial incentive in exchange for the collection of Your Personal Information

### Your CCPA Rights

As an individual residing in California, You have the rights identified in the “*Your Privacy Rights*” section of this Privacy Policy with respect Our use and disclosure of Your Personal Information.

In addition to those rights, if the “*Sensitive Personal Information*” section above indicates that We Process Your Sensitive Personal Information for the purpose of inferring characteristics about You, You have the **right to limit** that particular use of Your Sensitive Personal Information to certain permitted purposes under the CCPA, such as (i) to provide the goods or services reasonably expected by an average consumer who requests those goods or services; (ii) to prevent, detect, and/or investigate security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Information; (iii) to resist malicious, deceptive, fraudulent, or illegal actions directed at Us and to prosecute those responsible for those actions; (iv) to ensure the physical safety of natural persons; (v) for short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a current interaction with Us; (vi) to perform services on Our behalf; (vii) to verify or maintain the quality or safety of the Products; and/or (viii) for purposes that do not infer characteristics about You.

To exercise any of these rights, please refer to the “*Exercising Your Rights*” section at the end of this Privacy Policy.

### **Information for Residents of Delaware**

This “*Information for Residents of Delaware*” section applies to residents of Delaware. We will not share Your Personal Information with nonaffiliated third parties, except as described in this Privacy Policy or as otherwise permitted by law.

### **Information for Residents of Nevada**

This “*Information for Residents of Nevada*” section applies to residents of Nevada. If You are a resident of Nevada, We Process Your Personal Information in accordance with the “Nevada Privacy of Information Collected on the Internet from Consumers Act.” The disclosures in Part A of this Privacy Policy also apply to residents of Nevada, except in the event that anything in this section conflicts with the sections above, in which case this section shall take precedence. For the sake of clarity, the disclosures in the “*Information for Residents of All US Privacy Law States*” do not apply to residents of Nevada.

Nevada residents have the right to request that We do not sell certain Personal Information to select third parties for monetary consideration, even if their Personal Information is not currently being sold. To exercise this right, please refer to the “*Exercising Your Rights*” section at the end of this Privacy Policy.

You may be placed on Our internal Do Not Call List by contacting Us via the information set forth at the end of this Privacy Notice. Nevada law requires that We also provide You with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number: 702.486.3132 or 888.434.9989 (Toll-free); email: AgInfo@ag.nv.gov.

### **Information for Residents of Oregon**

This “*Information for Residents of Oregon*” section applies to residents of Oregon. We will not share Your Personal Information and Browsing Information with nonaffiliated third parties for marketing purposes, except after You have been informed by Us of such sharing and had an opportunity to indicate that You do not want a disclosure made for marketing purposes.

### **Information for Residents of Vermont**

This “*Information for Residents of Vermont*” section applies to residents of Vermont. We will not share Your Personal Information and Browsing Information with nonaffiliated third parties, except as permitted by Vermont law, such as to process Your transactions or to maintain your account. In addition, We will not share information about Your creditworthiness with



Our Affiliates except with Your authorization. For joint marketing in Vermont, We will only disclose Your name, contact information and information about Your transactions.

## **Information for Residents of Canada**

For a copy of any brochures or other information that more thoroughly explain Our policies, standards, or codes with respect to Our Processing of Your Personal Information, including information about the roles and responsibilities of the members of Our personnel throughout the lifecycle of the Our Processing of Your Personal Information, please contact Us using the mechanisms provided for in the “*Exercising Your Rights*” section at the end of this Privacy Policy.

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## **Changes to Our Privacy Policy**

We reserve the right to amend this Privacy Policy at Our discretion and at any time. When We make changes to this Privacy Policy, We will post the updated Privacy Policy on the Website and update the Privacy Policy’s effective date. The date the Privacy Policy was last revised is identified at the top of the page. If You would like Us to notify You of any changes to this Privacy Policy, You must ensure We have an up-to-date, active, and deliverable email address for You; otherwise, You are responsible for periodically visiting Our Website and this Privacy Policy to check for any changes.

## **Exercising Your Rights**

The following methods are available to send Us a request to exercise Your rights defined in this Privacy Policy or that You are otherwise entitled to under applicable law:

- Send an email with the subject line “Data Privacy Request” to: [privacy@constellationhb.com](mailto:privacy@constellationhb.com)
- Browse to Our Data Subject Access Request (DSAR) form which is located here: <https://app.smartsheet.com/b/form/08714159df9e4fbc9844ce5fe11c53c4>
- Write Us at:

### **For United States residents:**

NewHomeListingService.com  
c/o Constellation Homebuilder Systems Inc.  
Attn: Data Subject Access Request  
11350 McCormick Rd, EP3, Ste 200  
Hunt Valley, MD 21031

### **For Canada residents**

NewHomeListingService.com  
c/o Constellation Homebuilder Systems, a division of Perseus Group Software Corp.  
Attn: Data Subject Access Request  
8133 Warden Avenue,  
7<sup>th</sup> Floor, Markham, Ontario L6G 1B3

Not all of Your rights can be exercised through each individual method. In some cases, you may need to utilize more than one method to exercise all of Your rights. If you have any doubt as to whether a particular method is effective with respect to a particular right, please contact Us using the email method specified above.

All requests must provide sufficient information for Us to be able to verify You are the person whose Personal Information We hold. Whenever possible, You must describe Your request in enough detail so that We can properly locate the Personal Information related to the request. We cannot respond Your request unless We can verify Your identity and locate Your Personal Information. You may designate, in writing or through a power of attorney, an authorized agent to make requests on Your behalf by contacting Us using the same methods. We may still require You to directly verify Your identity and confirm that You provided the authorized agent permission to submit the request.

## **Contact Information**

To ask questions, or comment about this Privacy Policy and Our privacy practices, or for any other privacy-related inquiries, please:

Email Us at [privacy@constellationhb.com](mailto:privacy@constellationhb.com)

Write Us at the following postal address:

**For United States residents:**

NewHomeListingService.com  
c/o Constellation Homebuilder Systems Inc.  
Attn: Privacy Officer  
11350 McCormick Rd, EP3, Ste 200  
Hunt Valley, MD 21031

**For Canada residents:**

NewHomeListingService.com  
c/o Constellation Homebuilder Systems, a division of Perseus Group Software Corp.  
Attn: Privacy Officer  
8133 Warden Avenue,  
7<sup>th</sup> Floor, Markham, Ontario L6G 1B3