

# Privacy Policy

Effective date: January 1, 2021

## Purpose of the Privacy Policy

PGR NY Inc, doing business as S7ven.co (“Company”, “we” or “us”) provides a platform and tools to enable clients (“Clients” or “Customers”) to handle lead management and response for the real estate industry (“Service” or “Services”).

We are committed to respecting the privacy rights of our Clients, and we created this Privacy Policy to give you notice of how your private information will be used by us in connection with our Service. This Privacy Policy provides information on our policies and procedures regarding the collection, use and disclosure of personal and/or confidential information we receive from (1) Clients (including any third parties that submit information to us on behalf of Clients) and (2) visitors who simply browse our website (“Visitors”).

This Privacy Policy may be updated from time to time. We will notify you of any material changes by posting the new Privacy Policy on the Site. You are advised to consult this policy regularly for any changes.

## 1. What Information Do You Collect and How Do You Collect It?

At various times, you could be asked to provide information such as your name, title, company, email address, contact phone number or other information. Information collected is often defined as being either anonymous or personally identifiable:

- Anonymous Information refers to information that cannot be tied back to a specific individual. For instance, we may know that thousands of people have visited this Privacy Policy, but we do not necessarily know their names, where they live, or their date of birth. What we collect from visits such as this constitutes anonymous information. Some of the individuals who access our Services decline to use the personalization features that are available to them, and therefore those individuals are anonymous to us and the only data we collect about them is anonymous information.
- Personally Identifiable Information refers to information that tells us specifically who you are, such as your name, email address, or phone number.

Registering for or using a Service may allow the Company to “recognize” you to allow us to personalize our service for you.

### Anonymous Information

As is true of most applications and websites, we gather certain information (such as mobile provider, operating system, etc.) automatically and store it in log files. We use this information, which does not identify individual users, to analyze trends, to administer the application, to track users movements around the application or web site and to gather demographic information about our user base as a whole. We may link this automatically-collected data to certain Personally Identifiable Information.

### Personally Identifiable Information

If you are a Client, when you register with us via our Website, we will ask you for personally identifiable information, such as your first and last name, company name, title, email address, billing address, credit card information and password information for your email accounts. You may review and update the personally identifiable information in your profile by logging in and editing such information in your dashboard. If you decide to delete all of your information, we may cancel your account.

In addition, in connection with our Service, you may upload your private data or have third parties upload your private data to our Service. Given the confidential nature of the business information and data which may be uploaded in connection with our Service, we will treat this confidential information in the same manner as we treat personally identifiable information. We may retain an archived copy of your records as required by law or for reasonable business purposes in connection with our provision of Services.

Depending on the services you have chosen to use, some or all of your Personally Identifiable Information may be used by us to provide Services. Personally Identifiable Information may also be provided to intermediaries and third parties who assist us with the Services. Except as otherwise provided in this Privacy Policy, however, we will not rent or sell your Personally Identifiable Information to third parties without your permission. No third parties will directly collect personally identifiable information through our Website or Service.

We do not honor “Do Not Track” requests through your web browser because the data we collect is necessary to improve security, to generate reporting statistics, and to improve the user experience with our Services.

PGR NY INC is the owner of the information collected through the Service, provided however that you remain the owner of all business information and data uploaded to our Service.

# **Categories of personal information collected**

## **(a) Information you give us**

**Account and user profile information.** To create or join a S7ven account you or your account owner (e.g. your employer or broker) provide personal details such as your name, email address, phone number, password and similar account details.

**Billing information.** If you have a paid account with us, we collect billing details such as credit card information, billing address, transaction history.

**Communications,** such as information you provide when you contact our team, respond to surveys, participate in market research activities, participate in telephone conferences with our representatives, receive customer support, participate in a focus group, contest, activity or event, apply for a job, enroll in a program, interact with our social media accounts or otherwise communicate with us.

**Customer Data.** Customers and users granted access to a S7ven account by a customer routinely submit customer data to us when using the services. For example, leads imported into S7ven by a Customer or on behalf of a Customer are Customer Data.

**Marketing information,** such as your preferences for receiving marketing communications and details about how you engage with them.

**Other information** that you choose to provide but is not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

## **(b) Information from third party sources**

We may combine personal information we receive from you with personal information we obtain from other sources, such as our customers, partners, data providers, affiliates, business partners, such as joint marketing partners and event co-sponsors and publicly accessible sources such as Internet and social media platforms.

## **(c) Data collected automatically**

**Usage Data.** When you visit our Websites or use our Services we collect usage information such as the website you visited before browsing to the site, pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, duration of access, screen resolution, general location information such as city or town.

**Log data.** Like most websites and services delivered over the Internet, our servers automatically collect information when you access or use our Website or Services and record it in log files. This includes information such as date and time of access, address of the page visited, your computer or mobile device operating system type and version

number, browser type and version, IP address, unique identifiers, information about browser configuration and plugins, language preferences.

**Device information.** We collect information about devices accessing the Services, including type of device, manufacturer and model, what operating system is used, the version of the app you're using, device settings, application IDs, unique device identifiers and crash data.

**Cookies,** which are text files stored on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently and remembering your preferences, enabling functionality, helping us understand user activity and patterns, facilitating online advertising and measuring the effectiveness of our ads.

### No Information Collected from Children

As per our Terms of Service, we do not allow use of our Services and Websites by anyone younger than 18 years old. The company will never knowingly collect any personal information about children under the age of 18. If Company obtains actual knowledge that it has collected personal information about a child under the age of 18, that information will be immediately removed from any access. Because it does not collect such information, Company has no such information to use or to disclose to third parties. Company has designed this policy in order to comply with the Children's Online Privacy Protection Act ("COPPA") and California Consumer Privacy Act ("CCPA").

## 2. How Do You Use Personal Information?

**General Use.** For Clients, we use personal information to provide the Services and contact Clients regarding account activities, new version and product offerings, or other communications relevant to the Services. If you contact us by email or by filling out a registration form, we may keep a record of your contact information and correspondence and may use your email address, and any information that you provide to us in your message, to respond to you. In addition, we may use the personal information described above to send you information regarding the Service. If you decide at any time that you no longer wish to receive such information or communications from us, you can access your account and remove any personal information, but this may result in the closure of your account. The circumstances under which we may share such information with third parties are described in part (4) below.

**Customer Data** is used in accordance with Customer's instructions, including any applicable terms in the Terms of Service and Customer's use of Services functionality, and as required by applicable law. Customers may, for example, use the Services to grant and

remove access to a S7ven account, assign roles and configure settings, access, modify, export, share and remove Customer Data and otherwise apply its policies to the Services. With regards to Customer Data we act as a Service Provider and do not retain, use or disclose the personal information for a commercial purpose other than providing the Services.

We use your personal information for the following purposes or as otherwise described to you at the time of collection:

### **(a) Service delivery**

- Provide, operate, maintain, and improve our Service and Websites
- Communicate with you regarding the Service, including by sending you Service announcements, technical notices, updates, security alerts, and support and administrative messages or other communication
- Process your Service subscription transactions and process your related payments
- Understand your needs and interests, and personalize your experience with the Service and our Websites
- Provide support for the Service and respond to your requests, questions and feedback

### **(b) Research and development**

We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and develop other products and services. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

### **(c) Marketing**

We and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- Direct marketing. If you request information from us, use the Service or participate in our surveys, promotions or events, we may send you related marketing communications as permitted by law but will provide you with the ability to opt out.
- Interest-based advertising. We may contract with third-party advertising and social media companies to display ads on our Service and other sites. These companies may use cookies and similar technologies to collect information about you (including the device data and online activity data described above) over time across our Service and other sites and services or your interaction with our emails, and use that information to serve ads that they think will interest you.

- Other marketing activities to pursue our legitimate business interest to offer you products or services that may be of your interest.

#### **(d) Compliance and protection**

- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims)
- Audit our internal processes for compliance with legal and contractual requirements and internal policies
- Enforce our Terms of Service
- Protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft
- Comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities

#### **(e) Other purposes with your consent**

In some cases we will ask for your consent to collect, use or share your personal information for other purposes. For example, we may ask for your consent to post your testimonial or endorsement.

## **3. How Do You Store My Personal Information?**

### **Storage of Personal Information**

Company operates or leases secure data networks protected by industry standard firewall and password protection systems. Our security and privacy policies are periodically reviewed and enhanced as necessary, and only specially authorized individuals have access to the information provided by our Clients. Notwithstanding such measures, Company cannot guarantee that its security measures will prevent its computers from being illegally accessed and the individual information on them stolen or altered.

### **Third Party Hosting, Serving and Storage**

COMPANY MAY CONTRACT WITH A VARIETY OF THIRD PARTY SUPPLIERS/PROVIDERS/VENDORS FROM TIME TO TIME, TO PROVIDE FOR COMPANY'S HOSTING, SERVING, STORAGE AND TELECOMMUNICATION NEEDS, ETC., INCLUDING WITHOUT LIMITATION STORAGE OF OUR USERS' PERSONALLY IDENTIFIABLE INFORMATION. COMPANY SHALL NOT BE RESPONSIBLE OR LIABLE, AND HEREBY DISCLAIMS ALL RESPONSIBILITY AND LIABILITY, FOR CULPABLE (INCLUDING WITHOUT LIMITATION

NEGLIGENT) ACTS OR OMISSIONS BY ITS THIRD PARTY SUPPLIERS/VENDORS.

## **4. Do You Share And Disclose Any Personal Information?**

### **Service Providers**

We may use third parties to help operate our applications and Services and to deliver products and services, and may share your Personally Identifiable Information with our affiliates, service providers, vendors, suppliers, and other third parties that provide products or services for or through this Service (such as Web Site or database hosting companies, authentication providers, address list hosting companies, email service providers, analytics companies, distribution companies and other similar service providers that use such information on our behalf). Unless otherwise stated, these companies do not have any right to use the Personally Identifiable Information we provide to them beyond what is necessary for them to assist us.

### **Aggregate Statistics**

We may disclose aggregate statistics regarding user behavior as a measure of interest in, and use of, our Service, our applications and send emails to third parties in the form of aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual user.

### **Complying with Legal Process**

Company reserves the right to use or disclose your Personally Identifiable Information in response to subpoenas, court orders, warrants, or legal process, or to otherwise establish or exercise our legal rights or defend against legal claims or in the event you violate or breach an agreement with Company. Company will use and disclose your Personally Identifiable Information if we believe you will harm the property or rights of Company, its owners, or those of Company's other customers. Finally, we will use or disclose your Personally Identifiable Information if we believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person or property, violations of Company's other policies, or as otherwise required by law when responding to subpoenas, court orders and other legal processes.

### **Business Transitions**

In the event Company goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets as well as in the event of a bankruptcy, assignment for benefit of creditors or receivership, your Personally Identifiable Information may be disclosed and will likely be among the assets transferred. You may be

notified thereafter via prominent notice on our Company web site for 30 days of any such change in ownership or control of your personal information. Company further reserves the right to disclose, transfer or sell your personal information to companies who are affiliated with Company in Company's sole discretion.

## 5. Do You Allow Foreign Use Of The Service?

To the extent that you are accessing our Service in the United States while domiciled outside of the United States, you acknowledge that the Personally Identifiable Information you are providing Company may be collected and stored in the United States and elsewhere and therefore consent to the transfer of information to and storage of the information outside of your domiciled country and in the United States and elsewhere.

## 6. Additional Limits on Use of Your Google User Data

The App's use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

## 7. Your New York Privacy Rights

New York Consumer Privacy Act gives New York residents certain rights and control over their personal information:

- Right to request that we disclose what personal information we collect, use, disclose or sell, including specific pieces of your personal information. For more details about the personal information, we have collected over the last 12 months, including the categories and sources. We collect this information for business and commercial purposes . We share this information with the categories of third parties.
- Right to request the deletion of your personal information collected or maintained by us
- Right to opt-out of the sale of your personal information. Please note we do not sell your personal information.
- Right to not being discriminated for the exercise of your privacy rights above



## **8. If I have Questions Concerning This Privacy Policy?**

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us at [support@s7ven.co](mailto:support@s7ven.co)