

Millao Real Estate Privacy Policy

Millao Real Estate: Our Privacy Commitment to You

Effective Date: February 2, 2024

At Millao Real Estate. (“millao”), we value your trust and respect your privacy.

Millao Real Estate strives to support Real Estate Agents and Brokers like you by offering a fast and easy way to manage your Business operations, while respecting your privacy expectations and protecting your Personal Information. By “Personal Information”, we mean information about an identifiable individual such as a person’s name, email address, residential address, telephone number, and in some cases, more sensitive information such as but not limited to gender, demographic information, family status, social security or social insurance numbers, bank account information, and payment card information. To demonstrate our commitment to protecting your privacy, we have developed this Privacy Policy, which describes how we will collect, use, disclose, retain and protect Personal Information in order to provide you with our Deal Flow Management Solution and other Business–related services (collectively, the “Services”) offered and maintained by us and our affiliates from time to time. Our Privacy Policy is based on applicable privacy legislation and privacy principles. For the purposes of this Privacy Policy, the term “Site” means millao.com and, all related web pages, and all related websites operated by affiliates or divisions of Millao, but does not include any third party websites which are linked to or may link from this website whether or not such third party websites are used in connection with the Services. “Millao Apps' ' means the Site and all mobile applications and other applications, which provide access to the Services offered by Millao and its affiliates from time to time.

Identifying Purposes

Millao Real Estate collects, uses, and discloses Personal Information only for the purposes of providing you with our Services and for such other ancillary purposes consented to by you as a user of the millao Real Estate – AI enabled Deal Flow Management solution for Real Estate Agents and Brokers.

Personal Information

- More specifically, Millao Real Estate collects and uses (which may include Personal Information) for the following purposes:
- Millao Real Estate will use your Personal Information for the purpose of tailoring services to your interests.
- To contact you for the purposes of product information, service updates, notifications relating to the Services, newsletters and tailored service messages. Millao Real Estate will never sell your contact details to a third party.

- To monitor system usage, server and software performance, to improve system design, to create benchmarks and to conduct trending analysis. However, Millao Real Estate will only use non-identifiable, aggregate information (e.g. number of users and transactions) for these purposes.
- To assist you with technical support issues. It is important to remember that most technical issues can be resolved without a Millao Real Estate customer service representative viewing your Personal Information.
- To comply with any laws, regulation, court orders, subpoenas or other legal process or investigation and to protect ourselves and other individuals from harm.
- To assist in due diligence relating to any corporate action such as a financing, merger, amalgamation, sale or divestiture, provided that reasonable safeguards are taken to protect the confidentiality of Personal Information in our possession.

Consent

Millao Real Estate takes a consent-based approach to the collection, use and disclosure of Personal Information. We collect Personal Information directly from you and only obtain Personal Information from other organizations (e.g., your bank or other third party service providers) when you provide us with the account numbers, passwords or other credentials required to retrieve the Personal Information and for the purpose of providing you with our Services. We use and disclose the Personal Information only as described in this policy and our Terms of Use.

At any time and without penalty, Millao Real Estate users can withdraw their consent and close their Millao account by contacting us at {" "} admin@millao.com

- Once your account is closed, all Personal Information relating to your account will be deleted from our databases. However, anonymous transactional data (which does not personally identify you or any of your employees, agents, contractors and representatives) will be retained in our database. At any time, Millao Real Estate users can opt-out of most email communication from us by clicking on the opt-out link at the bottom of our emails. However, we may still contact you for administrative purposes (e.g. if we need to notify you of a change to our service, changes to our terms of use or privacy policy, there is a problem with your account or an anticipated service interruption, etc.). Withdrawing your consent will not apply to actions Millao Real Estate has already taken based on your prior consent. You further agree to indemnify and hold Millao Real Estate, its affiliates, subsidiaries, partners, service providers, suppliers and contractors and each of their respective officers, directors, agents, and employees (collectively, the “Millao”), harmless for any loss, cost, complaint, damage, claim or liability whatsoever arising from your collection, use and disclosure of personal information relating to your employees, Service Providers, Managers/Receptionist, Front Desk Managers, agents, contractors and representatives.

Limiting Collection

Millao Real Estate limits the collection of Personal Information by collecting only the information required to fulfill the identified purposes. We will collect only the minimum amount of information required to facilitate the Services. However, we provide you with the option of sharing additional information (e.g. your name or address) to enhance your use of the Services. You may in connection with some but not all of our Services have the ability to allow others (Guest Collaborators) access to your account. If you choose to allow others access to your account, you will need to provide the individual's name and email address. We will automatically send your guest a one-time email inviting him or her to visit the Site. Millao Real Estate stores this information for the sole purpose of sending this one-time email and tracking Site usage. The individual may contact us to request that we remove this information from our database. A Guest Collaborator who accepts the collaboration invitation will be subject to and must agree to the same terms as a regular Millao Real Estate customer. Note that by providing Guest Collaborators access to your account, you will also be providing the Guest Collaborator access to any Personal Information in your account. While the Guest Collaborator must agree to our terms of use, we take no responsibility for any collection, use or disclosure of your Personal Information by your Guest Collaborator. It is your responsibility to ensure that your Guest Collaborator complies with privacy standards that are no less stringent than our own. When you use certain Services, you have the option to share information with other accounts you have signed up for. You may choose from time to time to connect Millao Real Estate with other third party service providers in order to utilize these services in conjunction with the Millao Apps. Purposes may include saving copies of records, importing data from external sources, communications with third parties, among others. In such instances, your account and password credentials and other required information in respect of such third party service may be stored by Millao Real Estate for the purpose of providing this service.

Limiting Use, Disclosure and Retention

Millao Real Estate will not use or disclose Personal Information for purposes other than the identified purposes of the Services or such other purposes which we identify from time to time. We also ensure that only those employees responsible for the Services' operations have physical or technical access to Personal Information and only where such access is required to perform work authorized by their supervisors. Millao Real Estate will retain user and Personal Information in secure and segregated databases. If you choose to withdraw from the Services, we will securely destroy your Personal Information in our possession and control within 30 days unless we are required to retain

such Personal Information longer to fulfill our obligations to you or to third parties. However, we may retain non-personally identifiable information indefinitely. Business data will be retained for a period of five years from the date of subscription to service. You are responsible for reviewing and agreeing to these terms of use and policies. If you do not agree with these terms of use or privacy policies you should not use the services offered by such third party service providers. In the future we may collect information, including Personal Information, to enable you to access services provided by our third party partners and service providers whose servers may be located outside Canada. You will be subject to the terms of use and privacy policies of these third party service providers. You are responsible for reviewing and agreeing to these terms of use and policies. If you do not agree with these terms of use or privacy policies you should not use the services offered by such third party service providers. When Millao Real Estate data is viewed via a mobile device, some data is cached in the memory of the device. That data is deleted when the related application is closed and does not persist. If the application is put in the background without closing, the data may remain in the cache. We take no responsibility for any unauthorized viewing of this data by third parties. To provide improved security and reliability, Millao Real Estate employs a respected provider of Hosting solutions. You are welcome to make changes or corrections to Personal Information at any time. We also make every effort to ensure the accuracy of the information in our reports, displays, articles and support queries. You are responsible for ensuring that the information you have provided is truthful, accurate, reliable and complete.

Information obtained from Google APIs and Third Party APIs will be used by Millao Real Estate and sent to any other apps in accordance with the{" "} [Google API Services User Data Policy](#), including the{" "} [Limited Use requirements](#)

Safeguards

Millao Real Estate implements industry best practices appropriate to the sensitivity of your Personal Information. We use administrative, technical, and physical safeguards to protect your Personal Information against loss, theft, and unauthorized access, use, disclosure, copying, modification, disposal, or destruction in accordance with applicable legal requirements and industry best practices.

For example, we implement encryption and security controls to protect against unauthorized access to Personal Information during electronic transmission, and we train our employees to follow privacy and security practices specific to the Services. We also undertake security assessments to ensure that we maintain strong security controls.

We ensure that any third party acting on our behalf in respect of your Personal Information maintains reasonable and appropriate safeguards. For example, these third parties classify customer account data as “super sensitive”. This means that access to

such data is strictly limited based on business need and this data cannot be transmitted without the use of approved encryption methods. Additional information about our third parties' privacy practices is available upon request.

Openness

Millao Real Estate makes clear and transparent notice of its privacy practices publicly available via our Privacy Commitment and this policy. Our notices describe the collection, use, disclosure, and protection of Personal Information and provide the contact information of our privacy contact person.

Millao Real Estate will advise you at the first reasonable opportunity upon discovering or being advised of an incident where your personal information is lost, stolen, accessed, used, disclosed, copied, modified or disposed of by unauthorized persons or in an unauthorized manner.

Individual Access

You own your data which you input using the Millao Apps. Upon request, Millao Real Estate will also provide you with a list of the entities (e.g. third party service providers) to whom Millao Real Estate has disclosed your Personal Information, and the countries in which our servers are located (i.e., Canada or USA).

Additional Features

Millao Real Estate may offer publicly accessible blogs and community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. We take no responsibility for any information which you or your employees, agents, contractors and representatives post or publish on the Millao Apps and you agree to indemnify and hold the Millao Real Estate harmless for any loss, cost, complaint, damage, claim or liability whatsoever arising from any such post or publication. With your consent we may post your testimonial along with your name. If you want your testimonial removed please contact us at {" "}
admin@millao.com

- **Cookies and Other Tracking Technologies**

Third Party Tracking Technologies & Cookies.

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. We and some of our affiliates and third party service providers use session ID cookies on the Site. We do not link the information we store in cookies to any personally identifiable information you submit

while on our Site. We use session cookies to make it possible to navigate the secure environment inside our Site. When you log into Millao Real Estate, your browser may ask if you want it to remember you as a registered user of Millao Real Estate. If you accept, the session ID becomes a persistent cookie, which expires after two weeks of non-use. You can remove persistent cookies manually by following directions provided in your Internet browser's "help" file. If you refuse cookies, you will not be able to use Millao Real Estate, since session ID cookies are essential to navigation. The use of cookies by our tracking utility company and service providers is not covered by our Privacy Policy. We may use a third-party customer support platform, which uses cookies to make it easier for you to navigate our Help section. We have no access to or control over these cookies. This uses a cookie to track your session, which expires when you close your browser, and another optional cookie to remember your login for up to two weeks of inactivity. These cookies may be removed manually by following directions provided in your Internet browser's "help" file. Our third party partners employ clear gifs (a.k.a. Web Beacons/Web Bugs), images, and scripts that help them better manage content on our site. We do not tie the information gathered to our users' personally identifiable information. Millao Real Estate may from time to time implement other third-party analytics services that also use cookies. Millao Real Estate will ensure that no personally identifiable information is included in those cookies. If the use of cookies by any service provider differs materially from the practices already listed, we will revise this document accordingly and notify existing customers of the change(s).

Agents/Service Providers

Millao Real Estate uses third-party email services providers in order to effectively deliver emails to you. For occasional messages from Millao Real Estate, we will share only your email address and name (where applicable) with this provider. For the weekly summary of your account information (the "Your week in numbers" email), we will share your email address and name (where applicable). These companies are authorized to use your personal information only as necessary to provide these services to us. To unsubscribe from either or both emails, please see the "Consent" section above.

Notification of Privacy Statement Changes

We may update this privacy statement to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our website prior to the change becoming effective. We encourage you to periodically review our Privacy Policy for the latest information on our privacy practices.

Challenging Compliance

You may send us your privacy-related questions or challenge our compliance with our Privacy Commitment and Privacy Policy by submitting your concern to:

Email: privacy@Millao.com