

BUFFINI & COMPANY PRIVACY POLICY

Introduction

Buffini & Company recognizes that your privacy and the protection of your personal information are important. This statement is intended to disclose how Buffini & Company collects, uses and attempts to protect your personal information and to explain the rights and options you have regarding your personal information.

When you attend our events, purchase or use our products or services, interact with our website or contact us, Buffini & Company may collect personal information from which it may be possible to identify you. This might include information about your identity and your contact information, as well as information concerning your business, your purchasing history with Buffini & Company or your interaction with our websites. In general, we collect personal information to enable us to fulfill requests for products or services, to enhance your experience with Buffini & Company, to track your performance for your use and to enable us to assess the efficacy of our programs and to assist us in providing you with relevant information concerning your membership, our events, or our products or services. Buffini & Company keeps your personal information private. Buffini & Company will not sell your personal information to anyone. Furthermore, we will not share or disclose your personal information except as necessary to provide or enhance our products or services or to collect aggregated information about our clients and their production. Information generally available from other sources such as a Real Estate License or Multiple Listing Services is not considered personal information for purposes of this Privacy Policy.

Policy Application

This policy is intended to apply to the following category of persons who provide information to Buffini & Company:

- Event Attendees. Attendees at live events featuring content providers representing Buffini & Company.
- Website Visitors. Persons who use our website to obtain information, to interact with us, or to purchase our products or services.
- Customers/Members. Persons who individually, or on behalf of a business or business team, purchase or use our products or services.

Categories of Personal Information We Collect

Depending on how you interact with Buffini & Company, Buffini & Company may collect the following categories of personal information about you or your business:

- Your first and last name, address, business address, business phone number, job title, company and personal cell phone number and business or personal email addresses;
- If you visit or interact with our websites we may gather information about your visit and store it in log files. These log files may include internet protocol (IP) addresses, system configuration information and the URL of referring pages. We may also use cookies or other information gathering technologies for a variety of purposes such as providing us with information about how you interact with our website and to assist us in our marketing efforts.

- To register a Buffini & Company account, in addition to some of the categories of personal information listed above, you will need to provide an email address for identification and a password.
- If you purchase products or services from us, in addition to the personal information noted above, you will need to provide and we will retain a method of payment (credit or debit card number and security code) and a billing address.. We may also collect and store information reflecting the history of products or services you have used or purchased.
- When you interact with and use our products or services, you may provide and we may collect information relating to the number of transactions in which you have engaged, your database, your customer data and your revenue, income and expenses.
- If you choose to provide it, we may also collect and retain profile information about you such as the industry you work in, your Company, job title, profile photo, area served, industry designations and affiliates, professional biography, social media identity (for example, your Facebook or Instagram user ID) and personal information you provide such as photographs or posts.

How We Use the Information We Collect

Buffini & Company only processes and uses personal information in a way that is compatible with and relevant to the purpose for which it was collected or authorized. In general, we may use all categories of information described above, to the extent applicable, for the following purposes:

- To authenticate your identity;
- To provide, operate, maintain, improve and promote our websites as well as our products or services;
- To enable you to access and use our websites and our products or services;
- To process and complete transactions and related information, including purchase confirmations and invoices;
- To send transactional messages, including responses to your comments, questions and requests, provide customer service support and send you technical notices, updates, support and administrative messages, and provide you with product or service notifications from Referral Maker CRM;
- To send commercial advertising or marketing communications such as providing you with information about our products and services, features, surveys, offers, promotions, and events;
- To monitor and assess the efficacy of our products and services;
- To provide information about your existing or potential business transactions;
- To monitor and analyze trends, usage and activities in connection with our websites, products or services for marketing and advertising purposes;
- To allow you to give and receive business referrals on our website;
- To provide you a personalized experience in your use of our products or services.

In addition to the foregoing, at some of our events, third party companies that have sponsorship or other contractual relationships may ask for your business card or for permission to scan your attendee badge or otherwise capture your personal information. If you give your business card to a third party company or otherwise permit your attendee badge to be scanned or personal information to be captured, you are consenting to being contacted and marketed to by that company.

Information Sharing of Personal Information

We work with other companies who help us run our business and to assist us in our business operations, to analyze various aspects of our business and to provide our products or services. These companies provide services to help us deliver customer support, process credit card payments, receive and deliver communications, manage and contact our existing customers and otherwise operate and improve our products and services. These service providers also provide us with specific kinds of services such as customized badge printing for our events, providing our Client Direct service, shipping our products and backing up our customer data, analytics and credit card processing.

Our service providers may only process personal information pursuant to our instructions and in compliance with this Privacy Policy and other applicable law. We do not authorize our service providers to sell any personal information we share with them or to use any personal information we share with them for their own marketing purposes or for any purpose other than the services they provide for us.

In addition to the foregoing, we may also share your personal information with others in the following circumstances:

- When we are required to disclose personal information in response to subpoenas, court orders or legal process, or to establish or exercise our legal rights or defend against legal claims;
- Where we have a good faith belief that sharing is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, or situations involving threats to the physical safety of any person:

In addition, from time to time, Buffini & Company establishes contractual relationships with real estate, mortgage or real estate servicing companies that promote products or services that may be purchased by an individual client. Those companies may be related to individual clients as franchisors, licensors, independent contractors or principals. Buffini & Company may share the personal information of a client with a related business of the client if Buffini & Company, in its sole and exclusive judgment and discretion, determines that there is a legitimate business purpose or need for the disclosure of such information.

Buffini & Company may also aggregate data we acquire about our Members or customers. Non-personally identifiable aggregated data may be shared with third parties.

Your Rights Regarding Your Personal Information

Request for Disclosure

No more than twice in any twelve-month period you may request that Buffini & Company disclose the following for the prior twelve months.

- The categories and specific items of personal information that Buffini & Company has collected concerning you for the prior twelve months;

- The sources from which each category of information was obtained;
- The business or commercial purpose that Buffini & Company has for collecting each category of personal information;
- The categories of third parties with whom we have shared personal information;
- The business or commercial reason for sharing the information with third parties.

Request for Copy of Personal Information

No more than twice in any twelve month period, you may request that Buffini & Company provide you with a copy of your personal information. To the extent possible the information will be provided in a portable, readily usable fashion.

Request for Deletion of Personal Information

You may request that we delete your personal information from our system. If you make that request we will also instruct any third parties to whom we have shared your personal information to delete your personal information from their system. If you exercise your right to request the deletion of your personal information it may be impossible for Buffini & Company to provide products or services to you. Once your personal information is deleted by Buffini & Company or our third party service providers your deleted data cannot be recovered.

Notwithstanding a request for deletion, we will retain your personal information for the purposes of completing ongoing transactions or maintaining an ongoing business relationship, or to use the information internally in a lawful manner that is compatible for the context for which the information was provided. For example, we will retain copies of billing records reflecting the transactions in which you have engaged.

Methods of Exercising Your Rights

In order to make a request for the disclosure of your personal information, a copy of your personal information or to request the deletion of your personal information, please contact Buffini & Company Customer Service at 1-800-945-3485 x 1. Alternatively, you may make your request through the following website link: www.buffiniandcompany.com/privacy/contact

Changes to this Privacy Statement

Buffini & Company may occasionally update this Privacy Statement. When we do, we will also revise the "last updated" date at the top and bottom of the Privacy Statement. Your continued use of Buffini & Company products or services will be subject to the terms of the current Buffini & Company Privacy Policy.